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**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION IX
75 Hawthorne Street
San Francisco, CA 94105**

George Adams
Adams Steel/Golden State Metals
2000 East Brundage Lane
P.O. Box 70158
Bakersfield, CA 93307

RE: Golden State Metals
EPA ID Number CAD982489809

Dear Mr. Adams:

Enclosed is a Preliminary Assessment (PA) of the Golden State Metals site. This report contains the results of an evaluation conducted by Roy F. Weston, Inc. for the U.S. Environmental Protection Agency (EPA) under Section 104 of the Comprehensive Environmental Response, Compensation and Liability Act of 1980, as amended [42 U.S.C. 9404], commonly known as Superfund. The purpose of the PA is to determine whether this site may qualify for placement on the National Priorities List (NPL) or Superfund list.

Based on currently available information contained in the enclosed report, EPA has determined that no further assessment is warranted. Although EPA has determined that this site does not qualify for Superfund listing, the State of California may require further assessment or cleanup of this site under State law. You may wish to contact Megan Cambridge at the California Environmental Protection Agency, Department of Toxic Substances Control at (916)255-3727 for information pertaining to State assessment and cleanup requirements.

Please forward any written comments on the enclosed report to:

Philip Armstrong
U.S. Environmental Protection Agency (SFD-9-1)
75 Hawthorne Street
San Francisco, CA 95105

If you have any questions, please call Philip Armstrong at (415) 972-3098.

Sincerely,

A handwritten signature in cursive script that reads "Betsy Curnow".

Betsy Curnow, Chief
States, Tribes, and Site Assessment Section
Superfund Division

Enclosure

cc: Megan Cambridge, CA DTSC, w/enclosure
Barbara Doehring, CA DTSC, w/enclosure
Peter Woods, CA DTSC, w/enclosure
Anthony Medrano, RWQCB, w/enclosure
Wesley Nicks, Kern County Environmental Health Department, w/enclosure



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2365226

(4444-00001)

ABBREVIATED PRELIMINARY ASSESSMENT REPORT

FINAL EPA File Copy

Submitted To: Philip Armstrong, EPA Region IX

Prepared By: Greg Berner
Roy F. Weston, Inc.

Site Information: Golden State Metals
2000 East Brundage Lane
Bakersfield, CA 93387
Latitude 35° 21' 18" Longitude 118° 58' 08"

Site EPA ID Number: CAD982489809

USACE Contract Number: DACA45-98-D-0004, Task Order 16

Document Control Number: RFW20074.001.016.AAAR

Date: August 31, 2001

Attachments: Contact Reports
Site Reconnaissance Report/Photo Documentation
Latitude and Longitude Calculations Worksheet
USEPA GIS Site Report

1.0 Introduction

The U.S. Environmental Protection Agency (USEPA), Region IX, under the authority of the Comprehensive Environmental Response, Compensation, and Liability Act of 1980 (CERCLA) and the Superfund Amendments and Reauthorization Act of 1986 (SARA), tasked Roy F. Weston, Inc. (WESTON) to conduct a preliminary assessment (PA) of the Golden State Metals site in Bakersfield, Kern County, California.

The PA included the review of the information available from federal, state, and local agencies. Using these sources of existing information, the site was evaluated using USEPA's Hazard Ranking System (HRS) criteria to assess the relative threat associated with actual or potential releases of hazardous substances at the site. This report summarizes the findings of these preliminary investigative activities.



2.0 Apparent Problem

The Golden State Metals site was identified as a potential hazardous waste site and entered into the Comprehensive Environmental Response, Compensation, and Liability Information System (CERCLIS) on October 16, 1992 (1).

Scrap yard operations began at the site in the mid 1950s and expanded to include shredding operations in 1966. The facility shreds old auto bodies, white goods (e.g., appliances) and similar iron-bearing items for the purpose of reclaiming and selling the ferrous (iron-bearing) and non-ferrous metal portions. Over the more than 30 years that the facility has conducted shredding operations at the site, these operations have included the feeding of auto carcasses and white goods into a hammer mill where they are crushed and ground into smaller pieces; separation of the ferrous and non-ferrous metals from the process stream using magnets, "Z-box" separators, and cyclone separators; and generation of auto shredder waste (ASW). The ASW may consist of plastic, rubber, dirt, fabric, wood, insulation, some metals, and polychlorinated biphenyls. The ASW is stored on site on exposed soil at various locations and intermittently transported off site for disposal. The other waste generated by the facility is waste oil from the maintenance of on-site heavy equipment and stationary machinery. Until June 1989, the waste oil was disposed directly onto the exposed soils at the facility. Currently, it is stored in a tank before being transported off site by an oil recycler (2, 3, 4, 5, 6).

As part of a property transfer environmental assessment in September 1989, nine samples were collected from the 40,000 ton pile of ASW that was on site at the time, and soil samples were collected from seven boring locations within the property boundary. Results indicated the presence of PCBs in all nine of the ASW samples collected from the pile, at concentrations ranging from 8.43 to 37.80 ug/g total PCBs. Copper, lead, and zinc were detected at concentrations exceeding total threshold limit concentrations (TTLCs). Cadmium, lead and zinc were detected at concentrations exceeding soluble threshold limits (STLCs). In the soil samples, PCBs were detected in one of the seven borings (5).

Between the mid 1980s and late 1990s, the California Department of Toxic Substances Control (DTSC) conducted several inspections at the site. Violations noted during these inspections included waste oil and ASW that were allowed to impact the soil; ASW being transported off site without hazardous waste manifests; and failure to label hazardous waste containers, including a 55-gallon drum containing PCB capacitors that had been removed from appliances. An estimated 10,000 tons of ASW is currently on site. In March and April of 2001, a representative of the Kern County Environmental Health Services Department (County) conducted inspections of the site in response to a referral from the DTSC. During these inspections, the County representative confirmed the violations that had been noted in the previous DTSC inspections. The County subsequently notified the owner of Golden State Metals of the violations and the corrective actions necessary to gain compliance with the California Health and Safety Code and the California Code of Regulations (Title 22). The County then filed an Administrative Enforcement Order and Notice of Defense against the owner of Golden State Metals to ensure compliance and assess penalties (7, 8, 9, 10, 11, 12, 13, 14, 15).

WESTON contacted the DTSC office in Clovis, the Regional Water Quality Control Board (RWQCB) in Fresno, the San Joaquin Valley Unified Air Pollution Control District (APCD), and the Kern County Environmental Health Services Department. WESTON obtained and reviewed files from the DTSC. Files from the Kern County Environmental Health Department were included in those sent by the DTSC. The DTSC's and the County's involvement with the site is described above. The RWQCB does not have any files pertaining to the site. The San Joaquin Valley Unified APCD sent all available files. The APCD's involvement with the site is described below (16, 17, 18).

3.0 Site and Hazard Ranking System (HRS) Considerations

The significant HRS factors associated with the site include:

- Groundwater: There are three drinking water wells within 4 miles of the site, all of which are located 3 to 4 miles from the site. The population served by these wells is limited to approximately 454 people (19).
- Surface Water: The nearest surface water body (Central Branch of the Kern Island Canal) is 3.5 miles downslope of the site in an area of relatively flat terrain (20).
- Soil Exposure and Air: The site is located in an industrial area. There are no residences, schools, day care facilities, or terrestrial sensitive environments on site. The on-site population is limited to no more than 10 workers. The nearest residence is located approximately 0.25 mile from the site. Compliance monitoring of stack emissions was conducted at the site between 1992 and 1996. According to APCD records, no violations are on file (21, 22).

4.0 References

1. U.S. Environmental Protection Agency, Envirofacts Warehouse CERCLIS query results, http://www.epa.gov/enviro/html/cerclis/cerclis_query.html, data extracted July 19, 2001.
2. Medina, Ruben, California Department of Toxic Substances Control (DTSC), Inspection Report, December 27, 1994.
3. Adams, George, Golden State Metals, Letter to Larry Ramirez, DTSC, December 5, 1997.
4. California Regional Water Quality Control Board, Staff Report-Shredder Waste Disposal, May 9, 1986.

5. Mittlehauser Corp., environmental liabilities assessment (report cover page missing), Golden State Metals, February 1990.
6. Mittlehauser Corp., Contamination Investigation and Remediation Plan, Golden State Metals, August 1991.
7. Kovac, Thomas, DTSC (formerly California Department of Health Services), Report of Site Inspection, Golden State Metals, April 13, 1984.
8. Davis, Kit, DTSC (formerly California Department of Health Services), Inspection Report, Golden State Metals, February 13, 1991.
9. Ramirez, Larry, DTSC Inspection Report, Golden State Metals, November 21, 1997.
10. White, Gerald, DTSC, Letter to George Adams, Golden State Metals, January 28, 1998.
11. White, Gerald, DTSC, Letter to Mike Gold, Golden State Metals, February 20, 1998.
12. Woods, Peter, DTSC, Sacramento, Telephone conversation recorded on Contact Report by Greg Berner, WESTON, February 5, 2001.
13. Nicks, Wesley, Kern County Environmental Health Department, Telephone conversation recorded on Contact Report by Greg Berner, WESTON, August 9, 2001.
14. McCalley, Steve, Kern County Environmental Health Services Department, Letter to George Adams, Golden State Metals, June 11, 2001.
15. Canas, Joe, Kern County Environmental Health Services Department, Letter to George Adams, Golden State Metals, June 15, 2001.
16. Rosemary, San Joaquin Valley Unified Air Pollution Control District, Telephone conversation recorded on Contact Report by Paula Abajian, WESTON, May 14, 2001.
17. Doehring, Barbara, DTSC, Telephone conversation recorded on Contact Report by Nancy Dagle, WESTON, February 1, 2001.
18. Medrano, Anthony, RWQCB, Telephone conversation recorded on Contact Report by Nancy Dagle, WESTON, January 22, 2001.
19. U.S. Environmental Protection Agency, Region 9, Geographical Information Systems (GIS) Center, map and text for Golden State Metals, CAD982489809, May 18, 2001.

20. U.S. Geological Survey, 7.5 Minute Series (Topographic) Map, Lamont Quadrangle, California, Photorevised 1968 and 1973.
21. Smith, Crayton, San Joaquin Valley Unified Air Pollution Control District, Telephone conversation recorded on Contact Report by Greg Berner, WESTON, August 15, 2001.
22. Berner, Greg, WESTON, Site Reconnaissance Interview and Observations Report, Golden State Metals, August 20, 2001.

EPA ID: CAD982489809 Site Name: GOLDEN STATE METALS

State ID:

Alias Site Names:

City: BAKERSFIELD

County or Parish: KERN

State: CA

Refer to Report Dated: 08/31/2001

Report Type: PRELIMINARY ASSESSMENT 001

Report Developed by: Roy F. Weston

DECISION:

☒ 1. Further Remedial Site Assessment under CERCLA (Superfund) is not required because:☒ 1a. Site does not qualify for further remedial site assessment under CERCLA (No Further Remedial Action Planned - NFRAP)☐ 1b. Site may qualify for action, but is deferred to:☐ 2. Further Assessment Needed Under CERCLA:2a. Priority: ☐ Higher ☐ Lower

2b. Other: (recommended action) NFRAP (No Further Remedial Action Planned)

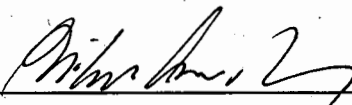
DISCUSSION/RATIONALE:

3 groundwater wells are located within 4 miles of the site, between 3 and 4 miles from the site. The nearest surface water body (the Central Branch of the Kern Island Canal) is over 2 miles from the site. There are no residences, schools, daycare facilities, or terrestrial sensitive environments on the site. There are 10 workers.

The U.S. Environmental Protection Agency (EPA) has determined that no further remedial action by the Federal Superfund program is warranted at the referenced site, at this time. The basis for the no further remedial action planned (NFRAP) determination is provided in the attached document. A NFRAP designation means that no additional remedial steps under the Federal Superfund program will be taken at the site unless new information warranting further Superfund consideration or conditions not previously known to EPA regarding the site are disclosed. In accordance with EPA's decision regarding the tracking of NFRAP sites, the referenced site may be removed from the CERCLIS database and placed in a separate archival database as a historical record if no further Superfund interest is warranted. Archived sites may be returned to the CERCLIS site inventory if new information necessitating further Superfund consideration is discovered.

Site Decision Made by: PHILIP ARMSTRONG

Signature: _____



Date: 12/04/2001

Memorandum

To: INDUS
Subject: Completed Document
Date: 12/4/01

Attached is the following completed document:

PA ☒ SI ☐ Other ☐

Site Name: Golden State Metals

EPA ID: CAD982489809

City, County, State: Bakersfield, Kern, CA

For EPA Use Only

Latitude: 35o 21' 18" N Longitude: 118o 58' 08" W

CERCLIS Data Changes: Document

EPA Decision: 001 - NFA

Archive Site: ☒ yes ☐ no

Lead Agency: EPA

Approval by Site Assessment Manager: PR

Sign-Off Date: 12/4/01

Document Screening Coordinator: J. J. Minions 4/2/02

Chief, States, Tribes, and Assessment Office: Betsy Arrow



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Revised 9/5/01

August 31, 2001

Philip Armstrong
U.S. Environmental Protection Agency
75 Hawthorne Street
San Francisco, CA 94105

Subject: Golden State Metals Abbreviated Preliminary Assessment Report.

Attached is the Abbreviated Preliminary Assessment Report for the Golden State Metals site, prepared by Roy F. Weston, Inc. Also included are the Transmittal List, HRS Scoresheets and Rationale, EPA Region IX Remedial Site Assessment Decision Form, Contact Reports, Site Reconnaissance Report/Photo Documentation, Latitude and Longitude Calculations Worksheet, EPA Region IX Site Prioritization Profile, xeroxed copies of the references, and EPA Region IX GIS Report.

If you have any questions regarding this report, please do not hesitate to contact me at (925) 975-0754.

Respectfully submitted,

Greg Berner
Site Leader

Attachments



CONTACT REPORT

AGENCY/AFFILIATION: Central Valley Regional Water Quality Control Board (RWQCB)		
DEPARTMENT: Fresno Office, Site Clean Up/Toxics		
ADDRESS/CITY: 3614 East Ashlan Avenue, Fresno		
COUNTY/STATE/ZIP:		
CONTACT(S)	TITLE	PHONE
Anthony Medrano	Associate Scientist	(559) 445-5116
WESTON EMPLOYEE: Nancy Dagle		DATE: 1/22/01
SUBJECT: Records of Incident		
SITE NAME: Golden State Metals		CERCLIS ID NO.: CAD982489809

The Fresno Office of the RWQCB has no files on the site.

CONTACT REPORT

AGENCY/AFFILIATION: California Department of Toxic Substances Control		
DEPARTMENT: Clovis Field Office		
ADDRESS/CITY: 1515 Toll House Road, Clovis		
COUNTY/STATE/ZIP: Fresno County, CA 93611		
CONTACT(S)	TITLE	PHONE
Barbara Doehring	File Clerk	(559) 297-3905
WESTON EMPLOYEE: Nancy Dagle		DATE: 2/01/01
SUBJECT: Records of Incident		
SITE NAME: Golden State Metals		CERCLIS ID NO.: CAD982489809

All available files were sent.

CONTACT REPORT

AGENCY/AFFILIATION: California Department of Toxic Substances Control		
DEPARTMENT: Hazardous Waste Management Department		
ADDRESS/CITY: P.O. Box 806, Sacramento		
COUNTY/STATE/ZIP: Sacramento County, CA 95816-0806		
CONTACT(S)	TITLE	PHONE
Peter Woods	Statewide Compliance Officer	(916) 322-4660
WESTON EMPLOYEE: Nancy Dagle		DATE: 2/05/01
SUBJECT: Records of incident		
SITE NAME: Golden State Metals		CERCLIS ID NO.: CAD982489809

In 1993 and 1994, Golden State Metals disposed of their auto shredder waste (ASW) at a Class I landfill. 10,000 tons of waste are currently on site.

CONTACT REPORT

AGENCY/AFFILIATION: Kern County Environmental Health Department		
DEPARTMENT: Environmental Health		
ADDRESS/CITY: 2700 M Street, Suite 300, Bakersfield		
COUNTY/STATE/ZIP: Kern County, CA 93263		
CONTACT(S)	TITLE	PHONE
Gale Fry	Environmental Health Specialist	(661) 862-8700
WESTON EMPLOYEE: Paual Abajian		DATE: 4/09/01
SUBJECT: Records of Incident		
SITE NAME: Golden State Metals		CERCLIS ID NO.: CAD982489809

Ms. Fry stated that her supervisor does not want to take the time to pull the files on the site.

CONTACT REPORT

AGENCY/AFFILIATION: City of Bakersfield Public Works Department		
DEPARTMENT: Wastewater Treatment		
ADDRESS/CITY: 8181 Ash Road, Bakersfield		
COUNTY/STATE/ZIP: Kern County, CA 93313		
CONTACT(S)	TITLE	PHONE
N/A	N/A	(661) 326-3249
WESTON EMPLOYEE: Paula Abajian		DATE: 5/07/01
SUBJECT: Sewer Systems		
SITE NAME: Golden State Metals		CERCLIS ID NO.: CAD982489809

There are no sewers in the area of Golden State Metals. The property most likely has a septic tank.

CONTACT REPORT

AGENCY/AFFILIATION: San Joaquin Valley Unified Air Pollution Control District		
DEPARTMENT: Compliance		
ADDRESS/CITY: 2700 M Street, Suite 275, Bakersfield		
COUNTY/STATE/ZIP: Kern County, CA 93301		
CONTACT(S)	TITLE	PHONE
Rosemary	Receptionist	(661) 326-6900
WESTON EMPLOYEE: Paula Abajian		DATE: 5/14/01
SUBJECT: Emissions Testing		
SITE NAME: Golden State Metals		CERCLIS ID NO.: CAD982489809

The San Joaquin Valley Unified Air Pollution Control District sent all available files.

CONTACT REPORT

AGENCY/AFFILIATION: City of Bakersfield Public Works Department		
DEPARTMENT: Water Resources Department		
ADDRESS/CITY: 8181 Ash Road, Bakersfield		
COUNTY/STATE/ZIP: Kern County, CA 93313		
CONTACT(S)	TITLE	PHONE
Allen Whitten	Engineer 1	(661) 326-3724
WESTON EMPLOYEE: Paual Abajian		DATE: 5/24/01
SUBJECT: City of Bakersfield Public Water Supply		
SITE NAME: Golden State Metals		CERCLIS ID NO.: CAD982489809

There are no drinking water intakes along the neighboring canals.

CONTACT REPORT

AGENCY/AFFILIATION: California Water Company		
DEPARTMENT: N/A		
ADDRESS/CITY: 3725 South H Street, Bakersfield		
COUNTY/STATE/ZIP: Kern County, CA 93304		
CONTACT(S)	TITLE	PHONE
N/A	N/A	(661) 396-2400
WESTON EMPLOYEE: Paula Abajian		DATE: 6/06/01
SUBJECT: Groundwater wells		
SITE NAME: Golden State Metals		CERCLIS ID NO.: CAD982489809

The California Water Company operates drinking water wells in the Bakersfield area. The company operates 134 wells in the area of east Bakersfield. The information was taken from their website: www.calwater.com/calwater/districts/bakersfield.htm

CONTACT REPORT

AGENCY/AFFILIATION: California Department of Toxic Substances Control		
DEPARTMENT: Clovis Field Office		
ADDRESS/CITY: 1515 Toll House Road, Clovis		
COUNTY/STATE/ZIP: Fresno County, CA 93611		
CONTACT(S)	TITLE	PHONE
Larry Ramirez	Hazardous Substances Scientist	(559) 297-3943
WESTON EMPLOYEE: Greg Berner		DATE: 7/29/01
SUBJECT: Missing Records		
SITE NAME: Golden State Metals		CERCLIS ID NO.: CAD982489809

The possibility exists that some files were out of place at the time of the last file request. Mr. Ramirez sent all recent files.

CONTACT REPORT

AGENCY/AFFILIATION: California Department of Toxic Substances Control		
DEPARTMENT: Hazardous Waste Management Department		
ADDRESS/CITY: P.O. Box 806, Sacramento		
COUNTY/STATE/ZIP: Sacramento County, CA 95816-0806		
CONTACT(S)	TITLE	PHONE
Peter Woods	Statewide Compliance Officer	(916) 322-4660
WESTON EMPLOYEE: Greg Berner		DATE: 8/09/01
SUBJECT: Site Description		
SITE NAME: Golden State Metals		CERCLIS ID NO.: CAD982489809

Mr. Woods mentioned that an unidentifiable dry percolation well exists somewhere on the property. Golden State Metals is one of the few auto shredders that operate on an unpaved surface. The concrete-like bonding agent, K20, is geared toward reducing the presence of inorganic substances found in auto shredder waste (ASW). Golden State Metals has been shipping ASW off site to a facility in Southern California without shipping manifests for quite a while. A neighboring ditch may be contaminated with ASW runoff. Mr. Woods recommends a site investigation to determine the location/uses of the percolation well.

CONTACT REPORT

AGENCY/AFFILIATION: Kern County Environmental Health Services Department		
DEPARTMENT: Environmental Health		
ADDRESS/CITY: 2700 M Street, Suite 300, Bakersfield		
COUNTY/STATE/ZIP: Kern County, CA 93263		
CONTACT(S)	TITLE	PHONE
Wesley Nicks	Environmental Health Specialist	(661) 862-8749
WESTON EMPLOYEE: Greg Berner		DATE: 8/09/01
SUBJECT: Site Description		
SITE NAME: Golden State Metals		CERCLIS ID NO.: CAD982489809

Kern County Environmental Health Department is currently is carrying out an Administrative Order against Golden State Metals due to shipping violations, among other things.

CONTACT REPORT

AGENCY/AFFILIATION: Kern County Engineering		
DEPARTMENT: Engineering/Surveying		
ADDRESS/CITY: 2700 M Street, Suite 570, Bakersfield		
COUNTY/STATE/ZIP: Kern County, CA 93263		
CONTACT(S)	TITLE	PHONE
Dan Chung	Drainage	(661) 862-5069
WESTON EMPLOYEE: Greg Berner		DATE: 8/16/01
SUBJECT: Sewer System		
SITE NAME: Golden State Metals		CERCLIS ID NO.: CAD982489809

Golden State Metals operates in an industrial area. Storm water runoff from the area flows underground to large sumps located some distance away.

CONTACT REPORT

AGENCY/AFFILIATION: San Joaquin Valley Unified Air Pollution Control District		
DEPARTMENT: Compliance		
ADDRESS/CITY: 2700 M Street, Suite 275, Bakersfield		
COUNTY/STATE/ZIP: Kern County, CA 93301		
CONTACT(S)	TITLE	PHONE
Crayton Smith	Compliance Specialist	(661) 326-6900
WESTON EMPLOYEE: Greg Berner		DATE: 8/15/01
SUBJECT: Emissions Testing		
SITE NAME: Golden State Metals		CERCLIS ID NO.: CAD982489809

Compliance monitoring of stack emissions was conducted at the site between 1992 and 1996. According to APCD records, no violations are on file.

SITE RECONNAISSANCE INTERVIEW AND OBSERVATIONS REPORT

DATE: August 20, 2001

SITE NAME: Golden State Metals

OBSERVATIONS MADE BY: Greg Berner

FACILITY REPRESENTATIVE(S) and TITLE(S): N/A

EPA ID: CAD98248989809

A drive-by of Golden State Metals was conducted on August 20, 2001. The following information was obtained and photographs were taken at the time of the drive-by:

The site is located in east Bakersfield along Brundage Lane. The office for the site is located along Brundage Lane. The property is unpaved, and in an industrial area surrounded by large commercial/industrial properties. The site is located in a topographically flat area. The nearest residence is approximately 0.25 mile from the site. At the time of the drive-by, large tractors were loading auto shredder waste into train cars and semi-truck trailers. On site, there were several piles of old auto shredder waste, new auto shredder waste, several large excavators, various tractors, semi-trucks, and scrap iron. WESTON observed no more than 10 workers on site. Two auto shredder mechanisms with attached smoke stacks were on site, neither of which were in use. A cloud of particulate matter was seen drifting from the load bucket of an on-site tractor.

Photographs



Photograph #1. View of southwest corner of property along East Brundage Lane.



Photograph #2. View of facility from north end. Notice pile of ASW on left.



Photograph #3. View from northeast corner of property. Notice loading of ASW into train cars in background.



Photograph #4. View of scattered debris at north end of property.



Photograph #5. From left to right: View of auto shredder conveyor and autos to be shredded. ASW in background.

Latitude and Longitude Calculation Worksheet (7.5' quads) Using an Engineer's Scale (1/50)

Site Name Golden State Metals CERCLIS # C A D 9 8 2 4 8 9 8 0 9

AKA Self Serve Auto Dismantlers

Address 2000 East Brundage Lane

City Bakersfield State C A ZIP 93387

Site Reference Point

USGS Quad Name Lamont

Township T295 Range R28E Section 1/4 1/4 1/4

Map Datum ☒ 1927 ☐ 1983 (Check one) Meridian Mt. Diablo

Map coordinates at southeast corner of 7.5' quadrangle (attach photocopy)

Latitude 3 5 ° 1 5 ' 0 0 "N Longitude 1 1 8 ° 5 2 ' 3 0 "W

Map coordinates at southeast corner of 2.5' grid cell

Latitude 3 5 ° 2 0 ' 0 0 "N Longitude 1 1 8 ° 5 7 ' 3 0 "W

Calculations

LATITUDE(x)

A) Number of ruler graduations between 2.5' (150") grid lines 3 7 9 (a)

B) Number of ruler graduations between south grid line and the site reference point 1 9 7 (b)

C) Therefore, $a/150 = b/x$ i.e. $x =$ Latitude in decimal seconds, north of the south grid line

Expressed as minutes and seconds (1" = 60") = 0 ° 0 1 ' 1 8 "N

Add to grid cell latitude = 3 5 ° 2 0 ' 0 0 "N + 0 ° 0 1 ' 1 8 "N

Site latitude = 3 5 ° 2 1 ' 1 8 "N

LONGITUDE(y)

A) Number of ruler graduations between 2.5' (150") grid lines 3 0 5 (a)

B) Number of ruler graduations between south grid line and the site reference point 7 6 (b)

C) Therefore, $a/150 = b/x$ i.e. $x =$ Longitude in decimal seconds, west of the east grid line

Expressed as minutes and seconds (1" = 60") = 0 ° 0 0 ' 3 8 "W

Add to grid cell longitude = 1 1 8 ° 5 7 ' 3 0 "W + 0 ° 0 0 ' 3 8 "W

Site longitude = 1 1 8 ° 5 8 ' 0 8 "W

**Golden State Metals Abbreviated PA Report
Xeroxed Copies of References**



CERCLIS Query Results

Consolidated facility information (from multiple EPA systems) was searched to select facilities

NAME: Beginning With: **golden state metals**

Results are based on data extracted on JUL-19-2001

Note: Click on the underlined CORPORATE LINK value for links to that company's environmental web pages. Click on the underlined MAPPING INFO value to obtain mapping information for the facility. Click on the underlined RECORD OF DECISION value for a RODS Site Report. Click on the underlined "View Facility Information" link to view EPA Facility information for the facility.

[Go To Bottom Of The Page](#)

<u>SITE EPA ID:</u>	CAD982489809	<u>SITE NAME:</u>	GOLDEN STATE METALS
<u>STREET ADDRESS:</u>	2000 EAST BRUNDAGE LANE	<u>FACILITY INFORMATION</u>	View facility information
<u>CITY NAME:</u>	BAKERSFIELD	<u>OWNERSHIP STATUS:</u>	Private
<u>STATE ABBR:</u>	CA	<u>FEDERAL FACILITY:</u>	N
<u>ZIP CODE:</u>	93387	<u>NPL STATUS:</u>	Not on the NPL
<u>COUNTY NAME:</u>	KERN	<u>SITE INCIDENT TYPE:</u>	
<u>CORPORATE LINK:</u>	No	<u>RECORD OF DECISION (ROD) INFO:</u>	No
<u>LATITUDE:</u>		<u>EPA REGIONAL LINK:</u>	No
<u>LONGITUDE:</u>		<u>MAPPING INFO:</u>	MAP
<u>SITE SMSA:</u>	0680		

Enforcement and Cleanup Actions

<u>Action</u>	<u>Action ID</u>	<u>Planned Start Date</u>	<u>Planned End Date</u>	<u>Actual Start Date</u>	<u>Actual End Date</u>	<u>Responsibility</u>	<u>Planned Outcome</u>	<u>Urgency</u>
DISCOVERY	001		12/31/1992		10/16/1992	EPA Fund-Financed		

Site Description

There were no Site Descriptions reported for this site.

DEPARTMENT OF TOXIC SUBSTANCES CONTROL

REGION 1
1515 TOLLHOUSE ROAD
CLOVIS, CA 93611
(209) 297-3901



Inspection Report

Golden State Metals, Inc.
2000 E. Brundage Lane
P.O. Box 70158
Bakersfield, CA 93387
EPA ID# CAD982489809

Inspected by: Ruben R. Medina, Hazardous Substances Scientist

Date of Inspection: 11/17/94

Date of Report: 12/27/94

I. Purpose

To conduct a comprehensive evaluation inspection.

II. Representatives Present

Golden State Metals, Inc.

Mr. Takehisa Miyake, President

DTSC Personnel

Ruben R. Medina, HSS

III. Owner/Operator

Hiuka America Corporation
2000 North Gaffey Street
San Pedro, CA 90731

IV. Background

Golden State Metals, Inc. (GSM) is owned and operated by Hiuka America Corporation (HAC). HAC has acquired ownership and the operation of GSM since December 14, 1989.

Currently, GSM is operating under a variance from the Department for the treatment and storage of auto shredder waste (ASW). (See attachment #1.) The variance will be valid until 1997. GSM obtained the variance as a result of an existing enforcement order for the removal and clean-up of the old ASW. The old ASW pile was recently removed and transported to Chemical Waste Management, Inc. - Kettleman Hills facility.

The 50-ton waste pile (ASW) was completely removed sometime in February 1994.

The treated ASW piles are stockpiled to the west side of the facility near the west side gated entrance. GSM is currently negotiating with the Taft landfill and the California Central Valley Regional Water Quality Control Board, to have the pile disposed of at the Taft landfill. GSM has developed a sampling and analysis plan for the treated auto shredder waste with specific criteria for waste acceptance at the Taft landfill.

V. General Description of the Facility

The primary function of this site is to collect ferrous metals for recycling. Items such as auto bodies, metal appliance and steel tanks are accepted by GSM. Mr. Miyake stated about 90% of the auto bodies are stripped down to the shell. Items such as the mufflers, radiators, and the tail pipes are removed prior to being accepted. The remaining auto bodies are disassembled. The ferrous portions are put into piles on-site for shipment off-site for recycling. The remainder of materials are put onto a conveyor belt and separated further by a magnetic system, then an air current separating system. The remainder is auto shredder waste which is currently stored in a waste pile on-site.

Vehicle maintenance is done on-site. Waste oil, filters, and solvents are generated by this activity. The waste oil is stored in a 300-gallon aboveground storage tank. Mr. Miyake stated the oil filters were put into the facility dumpster. The solvents are managed in a Safety-Kleen unit and taken off-site by Safety-Kleen.

Mr. Miyake stated GSM has used a steam cleaner on-site. The effluent flows to a 2-compartment sump with a submersible pump. The effluent is then filtered and revised back into the steam cleaner.

VI. Hazardous Wastes Activity

GSM produces the following hazardous waste streams: (1) auto shredder waste (ASW) "fluff", (2) used oil and used oil filters, (3) solvent waste, (4) used auto batteries, (5) oil water separator sludge. The ASW "fluff" consist of insulation materials, foams, upholstery padding and other non-metallic material. The fluff is separated by a high volume air stream during the separation process of metals and nonmetals. The fluff material contain some amounts of metals from the separation process.

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The waste oil is generated from equipment maintenance on site. The used oil is stored in a 300-gallon storage tank. Also generated from equipment maintenance is used oil filters. The used oil is drained for approximately 24 hours and are stored in 55-gallon drums.

Safety Kleen Inc. services the on site solvent parts cleaner unit on a monthly basis.

Used auto batteries are removed from old junk wrecked automobiles and are stored on wooden pallets. The used auto batteries are shipped to a battery recycler.

The oil water separator sludge is the result of the steam cleaning operation. The sludge is periodically pumped out on a regular basis by Gibson Environmental and taken to that site for treatment.

VII. Sampling Summary

No samples were taken during this inspection.

VIII. Violations

1. GSM violated 22 CCR section 66265.16 in that on or about November 17, 1994, GSM failed to provide facility personnel training in hazardous waste management procedures, emergency procedures, response to fires and/or explosions.
2. GSM violated 22 CCR section 66265.52(a) in that on or about November 17, 1994, GSM's contingency plan did not describe facility personnel actions to be taken in response to any unplanned sudden or nonsudden release of hazardous waste or hazardous waste constituents to air, soil or surface water at the facility.
3. GSM violated 22 CCR Section 66265.52(d) in that on or about November 17, 1994, GSM's contingency plan did not designate an qualified emergency coordinator name, address, and phone numbers (office and home), and an alternate emergency coordinator wasn't listed.
4. GSM violated 22 CCR section 66265.195(a) in that on or about November 17, 1994, GSM failed to conduct daily inspection of their 300-gallon waste oil tank. See attachment #2.

IX. Inspection Observation

Prior to conducting the inspection, permission was requested of Mr. Takehisa Miyake, president of Golden State Metals, Inc. and granted to Medina.

Record Review

Reviewed manifests dated in 11/93, 12/93, 1/94, 2/94 and 3/94. Manifests reviewed were legible and complete. No apparent problem were noted from this review.

Received copies of bill of lading that are used for the transport of waste oil. The waste oil is removed every 90 days as indicated on Cole's services bill of lading. Also received a bill of lading copy of the used oil filters. The used oil filters are drained, shredded and transported to Tamco in Rancho Cucamonga, California. (See attachment #4.)

Reviewed the weekly inspection logs starting on December 13, 1993 thru November 14, 1994. The weekly inspection logs are designed for the container storage area. GSM did not have a daily inspection log for the 300 gal aboveground tank that stored waste oil. Mr. Miyake stated that GSM inspects the tank on a weekly basis and is included on the weekly inspection logs. Medina notified Mr. Miyake that in Title 22 California Code of Regulations requires a daily inspection of aboveground tanks. Mr. Miyake assured me that this oversight on the part of GSM will be corrected in the near future.

Reviewed the contingency plan or emergency response plan as required by Health and Safety Code, Chapter 6.95 hazardous materials release response plans and inventory. The plan was missing a designated emergency coordinator (EC) and alternate. EC with home addresses and home phone numbers.

GSM has no formal training program that requires 40 hours of initial training and an annual refresher course of 8 hours.

GSM has an in line treatment system that treats auto shredder "fluff" for lead and possibly polychlorinated biphenyls contamination. GSM has a sampling and analysis plan that requires periodic sampling of the treated fluff on a periodic basis. The samples are sent to BC Lab in Bakersfield, CA for the analytical procedures. (See attachment #4.)

Walk Thru

An inspection was conducted of the oil/water separator and treatment unit. The oil/water separator was being serviced during the time of this inspection. GSM heavy equipments are steam cleaned over the oil water separator metal grate. The waste water is then pumped to a treatment unit which filter the water and it is then recycled back to the steam cleaner unit. Also located by the oil/water separator is a 300 gal. above ground waste oil tank. The tank had a hazardous waste label affixed to its back side. The start accumulation date was well within the 90 days storage limit. The aboveground tank appears to be in excellent condition.

Auto Shredder Area

The auto shredder unit was operating during the walk thru. At the east side of the unit were two piles; one pile contains the auto shredder "fluff", the other pile contains the metal components of the automobile. The in line treatment unit utilizes cement and sometimes sodium silicate as a treatment reagent.

GSM is currently experiencing difficulty in disposing of their treated auto shredder waste at the Taft landfill due to the total petroleum hydrocarbon (TPH) content. The problem exist as stated by Mr. Miyake is that the TPH content exceed the Taft landfill acceptance criteria. GSM is working with the County of Kern, Regional Water Quality Control Board, and the Taft landfill in acquiring a variance for the Taft landfill acceptance procedures.

Shop

The shop area was a metal shed fully enclosed structure. There were two Safety Kleen part washer unit located in the shop. The overall condition of the shop was in good condition.

X. Discussion with Management

A discussion was held with Mr. Miyake, president of GSM Inc. on whether GSM will be required to have a permit for the operation of the treatment unit. It was my understanding that GSM will be required to have a permit under the tier permitting program. After further discussion on this issue with Ed Nieto, from Sacramento, Calif., GSM is actually treating ASW in line prior to stockpiling on site. The Department was required by the hazardous waste management

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act of 1986 to adopt treatment standards regarding auto shredder waste. As a result of the Department establishing treatment standards, the Department acknowledges that the treatment process for ASW are in line, and all auto shredder facilities that have this type of treatment process can treat newly generated waste without a hazardous waste facility permit. Mr. Nieto was on this committee to establish the treatment standards and has stated that GSM will not be required to have a permit.

Mr. Miyake was then notified that the inspection revealed violations of Title 22 Calif. Code of Regulations and that a report of violations will probably be issued in the near future.

XI. Attachments

1. Storage variance letter
2. GSM weekly inspection logs
3. Copy of used oil filter bill of lading (Tamco)
4. GSM sampling and analysis plan

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Ruben R. Medina
Ruben R. Medina
Hazardous Substances Scientist

12/27/94
Date Submitted

Gerald H. White for EW
Gerald H. White
Unit Chief
Statewide Compliance Division

12/27/94
Approval Date

(3)

Golden State Metals, Inc.
2000 East Brundage Lane
P.O. Box 70158
Bakersfield, CA 93307

December 5, 1997

Mr. Larry Ramirez
California Environmental Protection Agency
Department of Toxic Substances Control - Region 1
1515 Tollhouse Road
Clovis, California 93611

DEPARTMENT OF TOXIC
SUBSTANCES CONTROL
"OFFICIAL FILE COPY"

**Re: Golden State Metals
Bakersfield, California
EPA ID No. CAL 000028572**

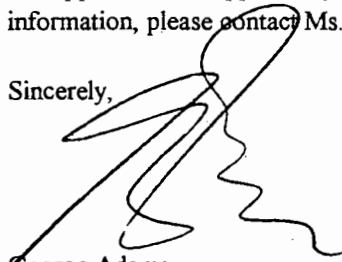
Pursuant to your site visit of the Golden State Metals (GSM) facility on November 20, 1997, it is our understanding that you have some questions regarding the residual material generated, on-site, as a result of the shredding operations.

GSM currently operates a shredder for the purpose of shredding automobile carcasses and white goods. The resulting shredder residue is collected and transported to the Adams Steel facility in Anaheim, California, for subsequent separation of the commingled steel and non-ferrous components. Upon final processing through the separation system, the material is screened and stockpiled for loading, transportation, and disposal to Copper Mountain Landfill in Welton, Arizona (current permit No. 1524-11322A-119).

Enclosed is a reconciliation of the recoverable components in a representative shipment (3 loads) of the unprocessed residual material generated at GSM. Our determination of the value of each shipment is approximately \$6,778 or 99.53 per ton. As such, we do not consider the newly generated residual material to be categorized as a waste, but rather a recyclable product.

We appreciate the opportunity to provide this information to your office. If you have any questions or desire further information, please contact Ms. Keiko Nakano or myself at (714) 630-8901.

Sincerely,



George Adams
President

Enc: Shredder Residue Reconciliation - Golden State Metals
cc: Mr. Mike Gold, GSM

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12/5/97

SHREDDER RECONCILIATION - GOLDEN STATE METALS

BEGINNING WEIGHT	136200 (3 LOADS)		
COMMODITY	LBS RECOVERED	PRICE/LB	\$VALUE
EXPORT	11562	\$0.38	\$4,393.56
TAINT	2566	\$0.54	\$1,385.64
COPPER	656	\$0.59	\$387.04
RADS	134	\$0.31	\$41.54
WIRE	130	\$0.25	\$32.50
STEEL	10756	\$0.05	\$537.80
TOTALS	25804		\$6,778.08
TRASH	110396		

PROFIT: \$6,778.08 ÷ 68.1 TONS = \$99.53/ TON OF TRASH

(4)

STAFF REPORT - SHREDDER WASTE DISPOSAL

On April 28, 1986, BKK Corporation filed a report of waste discharge to materially change the nature of their incoming wastes by accepting for disposal shredder wastes from Hugo-Proler Company. Board staff met with representatives of BKK and Hugo Neu-Proler in early April to open discussion regarding this proposal.

BKK Corporation, dba BKK Sanitary Landfill, is located at 2210 South Azusa Avenue, West Covina. BKK accepts for disposal nonhazardous solid waste under waste discharge requirements contained in this Board's Orders Nos. 78-140 and 84-41, adopted November 27, 1978, and May 21, 1984, respectively.

Effective December 1, 1984, BKK voluntarily ceased accepting hazardous wastes for disposal. Prior to that date, BKK disposed of hazardous and toxic wastes excluding radioactive wastes. Shredder wastes were also deposited at this site. Disposal of hazardous waste (except asbestos) is now prohibited by EPA and the Department of Health Services (DHS) at BKK.

On November 25, 1985, this Board adopted Resolution No. 85-9 designating a Class III landfill within the Region to accept shredder wastes as was required by Senate Bill No. 976 (Bergeson). Chiquita Canyon Landfill was the landfill designated as the site acceptable for receipt of shredder wastes if the operators chose to apply for modification of their waste discharge requirements. The operators of Chiquita Canyon have not applied for modification of their waste discharge requirements in accordance with Resolution No. 85-9.

Resolution No. 85-9 also provided "that upon application for modification of waste discharge requirements, other landfills within the Los Angeles Region may be authorized by the Board in the future to accept and dispose of shredder wastes." On April 28, 1986, BKK Corporation filed a report of waste discharge (application) to amend their waste discharge requirements to permit them to accept for disposal shredder wastes from Hugo Neu-Proler only. The quantity of wastes to be disposed will average 300 tons per day, but because of a current backlog of wastes at Hugo Neu-Proler the initial rate of disposal will be about 1,000 tons per day for a few weeks.

Hugo Neu-Proler Company, located on Terminal Island in Los Angeles Harbor, shreds old automobiles, appliances, and similar iron-bearing items for the purpose of reclaiming the ferrous and non-ferrous metal portions. The bulk of the waste (80%) is from car bodies. Car bodies (or other items) are fed into a large mill where rotating hammers shred the bodies into fist-size chunks. The iron is separated from the process stream with rotating drum magnets. The remaining material (20% by weight) consists of plastic, rubber, dirt, fabric, wood, insulation, and non-ferrous (nonmagnetic) materials such as stainless steel, copper, brass, aluminum and zinc castings. The process stream is next screened to remove fines. These fines also contain a residual of lead, one of the major causes of concern. The remaining process stream goes to a sink-float process where the non-ferrous material is separated from the remainder of the shredder residue. This residue and the fines together make up the shredder waste.

This is about an auto-shredding facility in L.A., Hugo Neu-Proler Co. to be disposed of at a West Covina (L.A.) landfill, BKK Corp.

CC:36

Generically, shredder waste is hazardous waste under California criteria because of its heavy metal content (usually lead, sometimes cadmium, nickel and/or zinc) and/or its PCB concentrations. Testing of this material is done by the Waste Extraction Test (WET) using the procedures contained in Section 66700, Title 22, California Administrative Code. This waste is not hazardous using the Federal criteria (EP Toxicity) that define a hazardous waste.

Hugo Neu-Proler has attempted to lower the hazardous constituent level in the waste stream by strict source control in the six feeder yards the company operates and by careful inspection of car bodies coming from other feeder yards. The controls include removing most liquids, gas tanks, mufflers, tailpipes, lead batteries, wheel weights, etc., which were formerly left with the bodies. Engines, tires, and usable parts have always been removed. That which remains after everything is stripped off is crushed. The crushed bodies are then trucked to Hugo Neu-Proler for shredding.

Hugo Neu-Proler Company has installed a treatment process for the fines stream noted above. This proprietary process essentially encapsulates the waste in a potassium silicate solution called K-20. The process as described in the technical bulletin with the report of waste discharge is effective on asbestos, lead in soil, chlordane (a pesticide), PCB's, and increases fire retardancy. This process reduces the lead concentration (STLC) to levels between 20 and 40 mg/l in the WET procedure. (The current Soluble Threshold Limit Concentration (STLC) hazardous waste limit for lead is 5.0 mg/l or above.

On February 21, 1986, DHS commented in a letter to Hugo Neu-Proler signed by David J. Iau, Ph.D., Chief, Alternative Technology and Policy Development Section, Toxic Substances Control Division as follows:

"We have reviewed the analyses of your auto shredder waste reported on Brown and Caldwell's letterhead, log No. P26-01-146, with a "reported" date of January 31, 1986.

The data contained in that report represents the analytical results from samples taken during a joint effort between the Department and Hugo Neu-Proler on January 3, 1986. The waste stream sampled is a new waste stream that reflects the process line changes initiated by Hugo Neu-Proler under the direction of yourself and George Trezak, Ph.D., of the University of California at Berkeley.

Based on the results reported in the said report for K-20 treated wastes, the Department has determined that such wastes have mitigating physical and/or chemical characteristics which render it insignificant as a hazardous waste pursuant to Section 66195, Title 22, California Administrative Code (CAC). Therefore, this waste is classified as a nonhazardous waste.

In the event that your waste changes so that previously submitted information no longer supports the Department's decision and your waste is hazardous, you must re-label your waste as hazardous. The management and disposal of your non-hazardous waste remains subject to the requirements of other state and local jurisdictions that regulate non-hazardous waste."

Below is the relevant section of Section 66305:

"(e) If a waste producer wishes to classify and manage as nonhazardous a waste which is hazardous by a criterion of Article 11, or is of a kind or from a source listed in 40 CFR 261.31, 261.32, 261.33(f), codified July 1, 1982, because it has mitigating physical or chemical characteristics which render it insignificant as a hazard to human health and safety, livestock, and wildlife, the producer shall apply to the Department for its approval to classify and manage the waste as nonhazardous."

Dr. Leu was contacted by staff on May 5th for information regarding the mitigating physical or chemical characteristics which render the wastes insignificant as a hazard according to Section 66305(e). Regarding the lead concentrations, his reply was that the majority of the lead in the shredder wastes was in a less hazardous chemical state than other states. Also, the criteria used to establish the STLC of 5 mg/l appear flawed at this time; Dr. Leu considers 50 mg/l to be a more appropriate level for lead (except organic lead). Dr. Leu was also asked if he thought the source quality criteria contained in the attached tentative order were appropriate. He responded affirmatively.

In April 9, 1986, Board staff obtained samples of the shredder waste and submitted them for analysis to the DHS laboratory in Los Angeles. Below are the results received contrasted with the source quality criteria in the tentative permit:

Date to Lab	4/10	4/10	4/17	4/25	Permit
Treated/cured	Yes/No	Yes/Yes	Yes/Yes	Yes/Yes	Limit (DHS STLC)
Barium	1.27 mg/l	2.60 mg/l	2.93 mg/l	1.82 mg/l	1.0 mg/l
Chromium	2.24 mg/l	1.28 mg/l	7.2 mg/l	5.76 mg/l	560 mg/l
Copper	0.095 mg/l	0.065 mg/l	-	-	25 mg/l
Lead	26.7 mg/l	116 mg/l	44.85 mg/l	81.2 mg/l	50 mg/l
Mercury	-	-	<.01 mg/l	<.01 mg/l	-
Nickel	3.85 mg/l	5.18 mg/l	4.44 mg/l	6.08 mg/l	20 mg/l
Zinc	318 mg/l	739 mg/l	745 mg/l	803 mg/l	250 mg/l
PBS's	11.8 ppm	69 ppm	51 ppm	111 ppm	50 mg/l

Although all the above samples were obtained the same day, they were submitted to the lab on different days to simulate the curing process necessary for treatment (except the first sample). Hugo Neu-Proler says that the wastes require seven days to properly cure. The second, third and fourth samples were obtained from a waste pile that had cured for at least seven days.

Staff is concerned about the above results for several reasons: The proposed permit limits were exceeded many times. The sample results from the same source vary unpredictably. These data would indicate all samples are hazardous except that DHS has declared this waste nonhazardous.

The preceding data indicate that a stringent source testing program and waste discharge requirements are necessary to protect the beneficial uses of the ground water adjacent to risk and prevent a condition of pollution to occur.

In other words, it has been given a warning and is, therefore, a designated waste.
(C. Neugebauer, M)

00138

The requirements or provisions in the proposed tentative order have been written to take these factors in account and include the following safeguards:

1. Only wastes from Hugo Neu-Proler may be accepted for disposal at present. The quality of the waste from other sites, because it is not treated, nor do the operators have as stringent source control standards, is far worse.
2. Only treated wastes may be disposed and those failing to meet the quality criteria must be retreated until they meet the limits or not disposed of at BKK.
3. Prior to disposal of any load, BKK must have in their possession the laboratory results of the source control monitoring for that load to prove that it meets the limits.
4. More frequent testing of the waste than proposed by Hugo Neu-Proler (three times per week compared to once per week) should minimize the heterogenous nature of the waste.
5. Disposal of the wastes over previously-deposited hazardous wastes and without commingling it with other waste streams will isolate a problem if it occurs.
6. Allowing the Order to extend for about six months and requiring Board reconsideration prior to continued disposal will allow the Board as well as staff to carefully monitor the disposal of these wastes for any adverse effects.

If the requirements proposed are strictly adhered to, staff feels the wastes will be nonhazardous and no water quality, nuisance or pollution problem will occur. It should be noted that, based on the results of some analyses to date, these wastes may not be able to meet the recommended limits and will have to be disposed of at an alternative site.

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EXECUTIVE SUMMARY

An assessment of the environmental liabilities associated with the Golden State Metals property in Bakersfield, California was conducted by Mittelhauser Corporation. Three areas of concern were identified in the assessment: the disposal of waste oil and oil leakage on surface soils of the site, the 40,000 ton pile of auto shredder waste, and several aboveground and underground storage tanks that may have leaked petroleum products into the soil. Auto shredder waste may be considered hazardous due to metals such as lead, cadmium, zinc, copper, and polychlorinated biphenyls (PCB) contained in the waste pile.

Areas where contaminants were suspected to exist were investigated to determine the depth of impacted soils and the migration potential of the contaminants. Borings for the purpose of collecting soil samples were placed near the Shearing Machine, the Larsen Separator, the Auto Shredder Waste Pile and the above and below ground storage tanks. A total of seven borings were drilled, and a total of 22 soils samples were analyzed.

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The Auto Shredder Waste Pile was also sampled at various depths and locations. A total of nine samples were collected from the waste pile and one additional sample was collected from waste near the Ferric Cyclone. The sampling plan was aimed at providing a representative collection of the waste in the pile for data on both the amount of PCBs in the waste and the percentage of metal remaining in the pile which may be reclaimed. Grab samples were taken with the aid of a backhoe. A sample of leachate water from the waste pile was also collected to be analyzed for contaminants.

Petroleum contamination was found in several areas on the site. Almost all soil samples analyzed for TPH as waste oil were found to contain some TPH, possibly indicating a natural source of TPH in the soils. TPH values over 100 parts per million occurred only in soil 20 feet and shallower. From this preliminary survey it appears that most TPH contamination from either surface spillage, waste oil disposal or leaking storage tanks has occurred in shallow soils and has not migrated significantly.

PCBs were detected in both the auto shredder waste and in soils near the shearing machine. PCB levels in the auto shredder waste and the soils did not exceed state and federal

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threshold limits of 50 ppm. Low levels of PCBs should not influence auto shredder waste reprocessing. The shredder waste was found to contain an average of 26.2 percent metals.

Acquisition of the site may be feasible if the auto shredder waste is reprocessed and removed. Shallow soils may require remediation, but these costs are not likely to be extremely prohibitive.

SECTION 1.0

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SECTION 1.0

INTRODUCTION

MITTELHAUSER
corporation

Hiuka America Corporation
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1.0 INTRODUCTION

Mittelhauser Corporation (MC) conducted an environmental assessment of the Golden State Metals (Golden State) auto shredder facility located at 2000 East Brundage Lane, Bakersfield, California. The assessment work was performed by (MC) under Work Order Numbers P1212-02 and P1212-03.

The Golden State Metals facility has been active as an auto shredding and scrap metal reclaiming enterprise over the past 30 to 35 years. The facility is situated on approximately 13.7 acres of flat land in an industrial sector of Bakersfield. Hiuka wanted to know what present and future environmental liabilities were associated with current and past operations of the facility which would impact Hiuka's decision to purchase the property.

The scope of assessment work consisted of conducting a preliminary inspection of the site. Interviews were conducted with facility personnel and other information was obtained regarding the site from reviews with appropriate regulatory agencies. This information facilitated the development of a site specific sampling and analysis plan, implementation of the approved sampling and analysis plan, and an interpretation of

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analytical results. The information gathered was evaluated to identify potential environmental liabilities which may be assumed by Hiuka in the event of property acquisition.

This report describes the results of the investigation of potential environmental concerns at the Golden State facility. The strategy for investigating these concerns and a summary of the findings are presented.

This assessment was focused solely on the facility owned and operated by Golden State located at the aforementioned address. The findings and conclusions drawn during the assessment are based primarily on the information provided by Golden State personnel and regulatory agencies and on analytical work performed by an independent laboratory. Though Mittelhauser has attempted to obtain the most accurate information while remaining within the financial constraints of the contractual agreement, Mittelhauser cannot be held responsible or liable for conclusions that are based on inaccurate or limited information. Any new information regarding the environment condition of the facility should be brought to the attention of Mittelhauser Corporation as soon as it becomes available.

SECTION 2.0

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SECTION 2.0
FACILITY INFORMATION

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2.0 FACILITY INFORMATION

2.1 SITE HISTORY AND DESCRIPTION

The Golden State site has been active since the mid-1950s when the site began operations as a scrap yard. In 1966, operations were expanded to include the shredding operations which are currently conducted by Golden State. In 1968, K & D Salvage became the new owners and operators of the facility. By late 1970, the site began operations under the current owners, Golden State Metals.

The site is currently 13.7 acres in size. The site has little topographic relief and is situated in a relatively flat area. The facility is completely fenced to restrict public access.

2.2 DESCRIPTION OF SURROUNDING AREAS

The Golden State facility is located in a predominately industrial area east of Bakersfield. No natural surface water bodies were observed in the immediate vicinity of the site. A public park and a few residential parcels are located approximately one-fourth of a mile north of the facility.

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Industrial facilities located in the immediate vicinity of the Golden State site include gasoline service stations, rental truck stations, a concrete manufacturer, livestock feed manufacturers, a rubber manufacturing company, a plating facility, and various chemical manufacturers. The majority of these operations appear to have been located in this area for many years.

2.3 FACILITY OPERATIONS DESCRIPTION

The primary operation conducted at the Golden State facility is metals reclamation through auto shredding operations. A variety of metal containing materials have been processed by the shredding equipment at the Golden State facility. These include automobiles, heavy equipment parts, old underground storage tanks, pipes, drums, white goods (including refrigerators, ovens, and washing machines), and, at one time, PCB containing materials.

The majority of these materials are fed to a hammer mill located on the northern portion of the site. The mill crushes and grinds the material into smaller pieces which are then passed through a set of magnetic drums to separate ferric metals from non-ferric materials. Large ferric metals are hand picked from a bailer and the remaining materials enter a cyclone which separates smaller ferric materials from auto shredder waste. The ferric materials are sent off-site by rail car as a product.

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Non-ferric materials which are not collected by the magnetic drums are transferred to a Larsen Separator. Salvageable metals (such as copper, aluminum, and brass) are collected at the bottom of the Separator while the light auto shredder waste is collected from the top.

The Golden State site also serves as a collection station for recyclable items such as aluminum cans, glass and plastic bottles. Spent lead-acid automobile batteries are also collected at the facility and sent off-site to recyclers. According to Golden State, the facility is in compliance with Title 22 Management of Spent Lead Acid Storage Batteries regulations.

2.4 WASTE MANAGEMENT PRACTICES

At least two types of California regulated hazardous waste are generated at the Golden State facility. These include auto shredder waste and waste oil. A description of the management procedures for handling each waste type is presented below.

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2.4.1 Auto Shredder Waste

Auto shredder waste constitutes one of the largest volumes of inorganic hazardous waste generated in the State of California. The waste is considered a hazardous waste because the material meets the criteria for hazardous waste as presented in Article 11 of Title 22 of the California Code of Regulations (22 CCR). The California Department of Health Services (DHS) determined that auto shredder waste is hazardous due to the total concentrations of lead, copper and zinc and soluble concentrations of lead, cadmium, copper, and zinc. Hazardous levels of polychlorinated biphenyls (PCBs) have also been found in some auto shredder waste.

Auto shredder waste is generated at the Golden State site by the ferric cyclone and the Larsen Separator. The waste is transported from the separation units to a designated area where the auto shredder waste has been accumulating since 1984. This storage area is located at the northern portion of the site and lies on approximately four acres of exposed soil. Currently, greater than 40,000 tons of auto shredder waste are estimated to be stored on the property. The volume of the pile is estimated to be 75,000 cubic yards. Four cannon sprinklers were installed around the pile in November 1988, to keep the waste moist and to

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prevent fires. An earthen berm was constructed around the pile at approximately the same time to prevent run-off from leaving the area.

Prior to 1984, the auto shredder waste had been disposed of in several different local landfills. Files at the California Regional Water Quality Control Board (RWQCB) indicate that, up until 1975, approximately 20,000 tons of auto shredder waste was disposed of at an off-site disposal facility which is owned by Golden State. According to Golden State personnel, from 1975 to 1984, auto shredder waste was disposed of in the China Grade Landfill and the Arvin County Landfill, both of which were not owned by Golden State.

2.4.2 Waste Oil

Waste oil is considered a hazardous waste in the State of California as defined in Article 9 of 22 CCR. Golden State generates waste oil from the maintenance of onsite heavy equipment and stationary machinery. Until June 1989, the waste oil was disposed directly onto the exposed soils at the facility. There is no specific location where the oil was disposed. Currently, an above-ground, 300-gallon tank has been used to collect the oil. An oil recycler removes the oil from the tank at a rate of approximately 300 gallons per 2.5 months.

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SECTION 3.0
SCOPE OF WORK

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3.0 SCOPE OF WORK

The Scope of Work for completing the property assessment of the Golden State facility consisted of three tasks. The first task consisted of a preliminary investigation to identify areas of concern and to develop a Sampling and Analysis Plan (SAP). The second task was the implementation of the SAP and the final task was the evaluation of the analytical results.

3.1 PRELIMINARY INVESTIGATIONS

On August 23, 1989, Mittelhauser (MC) conducted a site visit at the Golden State facility. The visit consisted of an interview with Mr. Alan Daniels of Golden State and a visual inspection of the entire facility. Additional information was obtained from discussions with regulatory agencies including the California Department of Health Services (DHS), the California Regional Water Quality Control Board (RWQCB), the Kern County Fire Department, and the Kern County Department of Environmental Health. The discussions with regulatory agencies were focused on identifying past violations and potential problems at the facility. The discussions also confirmed information provided by other sources. Aerial photographs from 1956, 1975, and 1989 were

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obtained from the Kern County Department of Public Works to evaluate the historical uses of the property.

The next stage of the preliminary investigation was to identify the areas which appear to pose the most significant potential environmental liabilities. A sampling and analysis plan was developed to outline the procedure for investigating the possible environmental impact posed by these areas. The final sampling and analysis plan was approved by Hiuka America during a meeting with (MC) on September 5, 1989.

3.2 IMPLEMENTATION OF THE SAMPLING AND ANALYSIS PLAN

Field operations at the Golden State facility were conducted from September 6, 1989, through September 8, 1989, in accordance with the approved Sampling and Analysis Plan. The plan involved the collection of soil samples from seven boring locations within the property boundary. The shallow subsurface soils were collected and analyzed to evaluate if contamination had occurred due to the operations on the surface above. Deep soil samples were collected at depths of 50 feet to greater than 100 feet below ground surface. These samples were collected and analyzed to evaluate if any major contamination exists beneath the site.

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Additional samples were collected from the auto shredder waste pile. Ten shredder waste samples were collected to evaluate the hazardous constituents in the samples. Primary concern focused on the amount of polychlorinated biphenyls (PCBs) present in the sampled material. In addition, at the request of Hiuka America, the shredder waste samples were analyzed to evaluate the amount of potentially salvageable metals in the samples.

To evaluate if the run-off collected by the shredder waste pile berms was a hazardous waste, a single grab sample of the liquid was collected and analyzed. The sample was collected from a run-off ditch at the southern side of the waste pile.

3.3 EVALUATION OF RESULTS

The final task for completing the property assessment involved the evaluation of analytical results based on a technical and a regulatory perspective. A discussion of this evaluation is provided in Sections, 5.0, 6.0, and 7.0.

SECTION 4.0

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4.0 METHOD OF INVESTIGATION

This section provides a description of the areas which were identified during the preliminary investigation of the Golden State site. These areas may have been contaminated due to the operation or the presence of the following items:

Underground Storage Tanks
Aboveground Tanks
Auto Shredder Waste Pile
Larsen Separator
Shearing Machine
Waste Oil Disposal

A procedure for evaluating each of these suspected areas was included in the Sampling and Analysis Plan. A summary of these procedures is presented in Section 4.2.

4.1 AREAS OF CONCERN

Areas suitable for investigation were chosen based on site history and visual evidence. In most cases, factors such as surface waste location or known disposal location governed the choice of these areas. In some instances, the need to derive subsurface information was accomplished by combining near-surface information gathering with deep subsurface data gathering.

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4.1.1 Underground Storage Tank

Three abandoned underground storage tanks are located near the south entrance of the Golden State facility. The tanks previously held diesel fuel, regular gasoline, and motor oil in volumes of 8,000 gallons, 6,000 gallons, and 500 gallons, respectively. The tanks were installed in the early 1970s and use of the tanks was discontinued by 1987. The tanks were emptied through the dispensers and left in place with the associated underground piping. These steel tanks are not equipped with a leak detection system and have not been tested for leaks.

4.1.2 Aboveground Tank

Four aboveground tanks are located near the south entrance to the site in the vicinity of the underground storage tank location. The tanks consist of three approximately 300-gallon tanks containing motor oil, gasoline, and waste oil, and one approximately 100-gallon tank containing motor oil.

The tanks are not equipped with secondary containment and are placed on risers above exposed soil. There is visual evidence of soil contamination beneath these tanks.

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4.1.3 Auto Shredder Waste Pile

Auto shredder waste generated from the ferric metal cyclone and the Larsen Separator has been accumulating in a pile on the northern portion of the facility since 1984. The pile lies on an area of approximately four acres, on exposed soil. Because the pile has been susceptible to fires in the past, a four-cannon sprinkler system was installed to keep the pile wet. An earthen berm was subsequently constructed around the pile to prevent run-off from migrating from the waste storage area.

4.1.4 Larsen Separator

The Larsen Separator is located near the center of the Golden State facility. Auto shredder waste generated by the separator is placed on exposed soil near the unit before being transferred to the large shredder waste pile located on the northern portion of the facility.

Until approximately one year ago, water was periodically discharged onto the soil during the routine cleaning of two water-holding tanks that were once a part of the Larsen Separator. DHS inspectors noted this practice and ordered Golden State to cease this practice. It is possible that wastewater from these

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tanks may have been sources of both surficial and subsurface contaminants in this area.

A large scrap pile of "white goods" is also located in the vicinity of the Larsen Separator. The possibility of PCBs in the white goods which may have impacted soil will be investigated.

4.1.5 Shearing Machine

A shearing machine is located on the eastern edge of the Golden State facility. Long pieces of metal are cut by the machine to allow transportation of the scrap prior to off-site sale. In the past, waste oil had been used to lubricate the blade mechanism of the equipment. No catch basin or other containment system is coupled to the machinery. Consequently, waste oils are known to have spilled directly to the ground surface over an unknown period of time.

4.1.6 Waste Oil Disposal

Waste oil generated from the routine maintenance of onsite heavy equipment had been disposed of directly onto the facility soil until June 1989. According to facility personnel, there is no specific location where the oil was discharged. A

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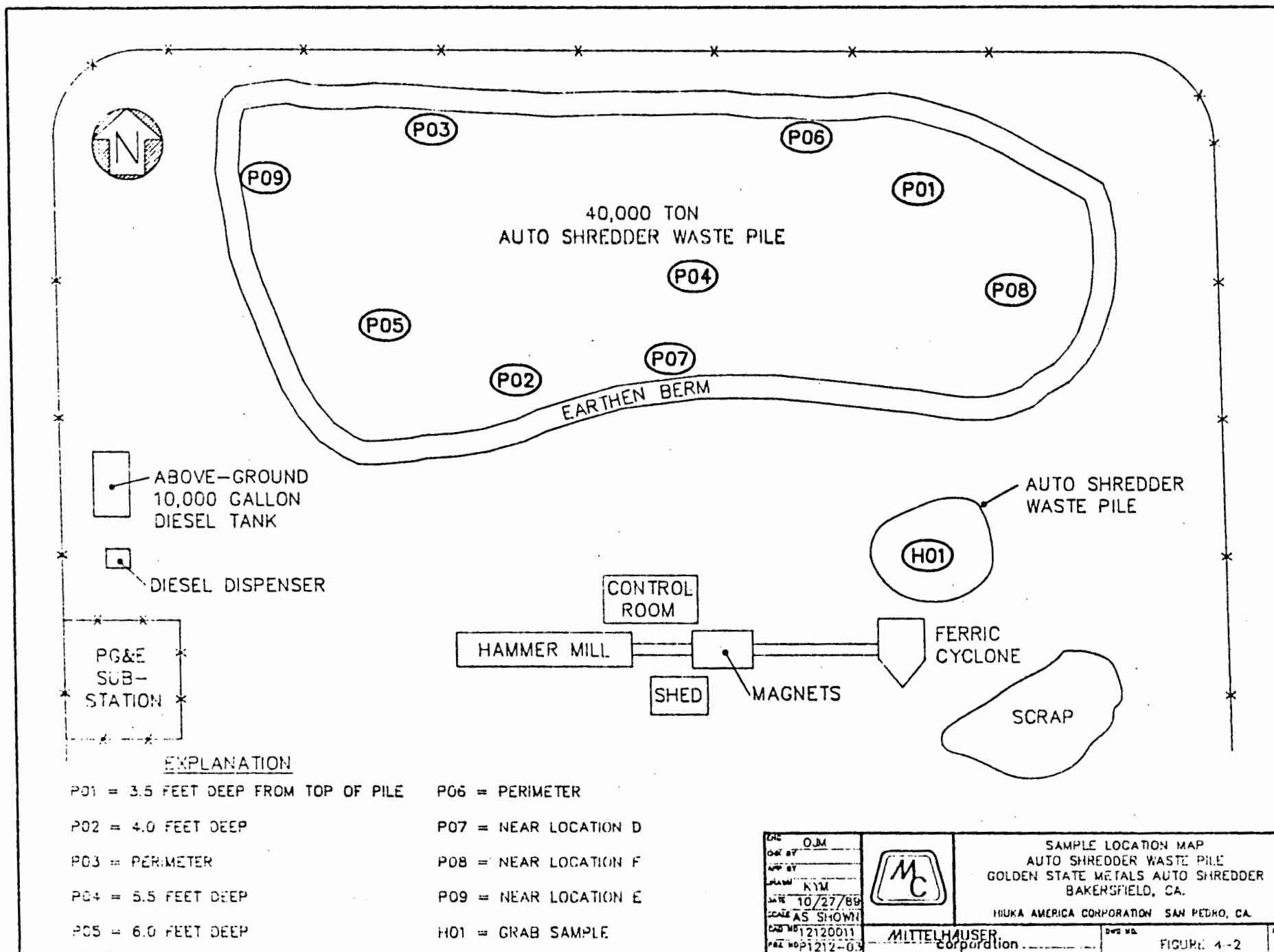
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visual inspection of the facility identified areas where these discharges may have occurred. These areas include: (1) the area near the shearing machine, (2) adjacent to the aboveground storage tanks, and (3) near the hammer mill. Additional oil stains are observed in other areas of the facility.

4.2 SAMPLING AND ANALYSIS

Seven borings were drilled onsite to assess subsurface conditions. These areas are identified as Sample Locations A through G on Figure 4.1. Surficial sampling was concentrated at the auto shredder waste piles, where both Figures 4-1 and 4-2 present the location of the sampled areas.

The Summary Table in Appendix B presents the analytical parameters and results for each sample. In general, samples gathered from depths of 50 feet below ground surface or deeper were analyzed for total petroleum hydrocarbons (TPH), and/or volatile and semi-volatile organic compounds to identify the presence of contamination that could present environmental impact. Samples taken from shallower depths were analyzed for specific components more closely associated with activities which occurred on the surface above. A summary of the Sampling and Analysis Plan is presented below.



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4.2.1 Underground Storage Tanks/Aboveground Tanks

Subsurface soil samples were taken from Sample Locations A and G, immediately south and north, respectively, of the underground and aboveground storage tanks. Soil samples were collected at 10-foot intervals down to a depth of 40 feet in Boring G. Samples were collected at 10-foot intervals to a depth of 50 feet in Boring A, followed by a final sample at 100 feet.

Underground tanks are not in compliance with state regulations and were considered possible point sources of concern. Gasoline, diesel, and waste oil tanks were investigated with samples collected at shallow depths in both borings. Samples collected at 10 and 20-foot depths were analyzed for TPH as gasoline and for TPH as waste oil to identify which tanks leaked, if any. Samples collected from greater depths were analyzed for TPH as waste oil. Additional quantification of possible deep contamination was evaluated by analyses for semi-volatile and volatile hydrocarbons. See Table 5-5 for analysis summaries of these samples. Samples analyzed from Sample Locations A and G were assigned the following sample numbers:

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<u>Sample</u>	<u>Sample #</u>
10-foot soil	1212-02-A01
20-foot soil	1212-02-A02
50-foot soil	1212-02-A03
100-foot soil	1212-02-A04
10-foot soil	1212-02-G01
20-foot soil	1212-02-G02
30-foot soil	1212-02-G03
40-foot soil	1212-02-G04

4.2.2 Larsen Separator

Subsurface soil samples were collected from a boring drilled at Location B, near the Larsen Separator. Soil samples were collected at 10-foot intervals down to a depth of 50 feet, after which the boring was advanced to 100 feet for a final sample.

Soil samples collected from the 10 and 20-foot depths were analyzed for TPH and PCBs. TTLC and STLC parameters were evaluated for five metals of primary interest to the investigation. The introduction of metals to the soils is of concern due to operations of the separator and the onsite disposal of waste oil. The deepest sample was analyzed for TPH and PCBs also. Additionally, volatile and semi-volatile constituents were analyzed to evaluate the presence or absence of contamination at depth. TTLC and STLC parameters were also analyzed for seventeen

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priority pollutant metals. Table 5-6 details sample results for Area B. Each sample was assigned the following sample numbers:

<u>Sample</u>	<u>Sample #</u>
10-foot soil	1212-02-B01
20-foot soil	1212-02-B02
50-foot soil	1212-02-B03
100-foot soil	1212-02-B04

4.2.3 Shearing Machine

Subsurface soil samples were collected from Sample Location C which is located near the shearing machine on the eastern portion of the site. The samples were collected to evaluate the effects of historical waste disposal around the machine. Soil samples were collected at 10-foot intervals down to a depth of 50 feet, and then at 100 feet in depth. Near surface samples were collected primarily to evaluate possible waste oil migration, while the deeper samples were collected to evaluate the possibility of contaminants from other point sources as well. Table 5-7 provides sample analyses results from Boring C. Each sample analyzed has assigned the following sample numbers:

<u>Sample</u>	<u>Sample #</u>
10-foot soil	1212-02-C01
20-foot soil	1212-02-C02
50-foot soil	1212-02-C03
100-foot soil	1212-02-C04

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4.2.4 Auto Shredder Waste Pile

Sampling and analysis plans for soils adjacent to the auto shredder fluff pile were formulated to address the following problem: Water generated by precipitation was known to have been introduced to the fluff pile material, giving the possibility of metals or hydrocarbons leaching into the subsurface. Subsurface leaching potential was investigated by drilling three borings adjacent to the pile. Borings E and F were advanced on the east and west perimeters of the pile to assess near-surface soil characteristics. Boring D was advanced on the southern side of the fluff pile.

Boring D was drilled to provide additional information of near-surface soils; to characterize subsurface soils to at least 100 feet in depth and to encounter groundwater.

Soil samples from Sample Location D were collected at 10-foot intervals down to a depth of 130 feet. Soil samples from Sample Locations E and F were collected from depths of 10 and 20 feet. The soil samples taken from the 10 and 20-foot depths were analyzed for metals, PCBs, and TPH to characterize the vertical extent of potential migration of contaminants auto shredder waste. TPH was analyzed to assess the potential of past waste oil

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disposal practices in this area. The 50 and 100-foot samples, from Sample Location D, were analyzed for TPH and for volatile and semi-volatile organic compounds to evaluate if any major contamination exists beneath the fluff pile.

Analyses results from Areas D, E, F, and I are shown in Table 5-8.

Samples collected and analyzed from Sample Locations D, E, and F were assigned the following sample numbers:

<u>Sample</u>	<u>Sample #</u>
20-foot soil	1212-02-D02
50-foot soil	1212-02-D05
60-foot soil	1212-02-D06
10-foot soil	1212-02-E01
20-foot soil	1212-02-E02
10-foot soil	1212-02-F01
20-foot soil	1212-02-F02

4.2.5 Auto Shredder Waste

Sampling of the fluff pile material was designed to further characterize the material with emphasis on two priorities: (1) The possible presence of PCBs and (2) the metal content. Grab samples were retrieved from nine different sections of the fluff pile, and an additional sample was obtained from the fluff

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generated at the ferric cyclone. Samples were collected in the fluff in "fresh" material exposed by heavy equipment at the direction of Mittelhauser personnel. Figure 4-2 presents the locations of these samples.

Sampling of the waste pile was also geared to address PCB parameters due to treatment plans currently being considered at the facility. Golden State is in the process of installing a treatment system in line with the shredding units. An approved, permitted treatment system would be capable of reducing metals present in the fluff to levels that would allow Class III landfill disposal. If substantial amounts of PCB-containing materials were processed by the shredding equipment, then the waste could contain elevated concentrations of PCBs. In this event, the waste would contain a hazardous component requiring more costly or complicated treatment.

Each sample was analyzed for metals and PCBs to determine the hazardous constituents in the samples. In addition, the samples were analyzed to estimate the weight percent of metal in the samples. This information was gathered to provide Hiuka America with a preliminary evaluation of the salvageable metal content in the auto shredder waste pile. The samples were assigned the following numbers:

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1212-02-P01	1212-02-P06
1212-02-P02	1212-02-P08
1212-02-P03	1212-02-P09
1212-02-P04	1212-02-H01
1212-02-P05	

A sample split with the suffix A was used to identify the sample submitted for analysis of metal content. Table 5-4 details analysis results. More detailed reference to these samples was made previously in correspondence included in Appendix C.

4.2.5.2 Leachate

Sampling of water associated with the fluff pile was directed at characterization of the leachate fluid. A surficial sample of leachate fluid was recovered from a collection ditch on the perimeter of the pile. Acidity and dissolved chemical characteristics, especially those associated with known fluff pile PCB and metal constituents, were included in the analysis plan. The assigned sample number is 1212-02-I01. Results are included in Table 4.5.

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SECTION 5.0

FINDINGS

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5.0 FINDINGS

Preliminary information was gained through historical file searches and supplemented by regulatory interface and aerial photograph review. This information led to several historical findings regarding the property site. Further information was gathered by conducting site reconnaissance and personnel interviews. This included the initial job walk and interview process, as well as sampling of materials accessible at the surface of the site. Assessing subsurface data was the final task of the investigative process. Subsurface information was gathered utilizing drilling and sampling equipment suitable for the depth of investigation and the types of metals and hydrocarbons suspected below the site surface.

5.1 PRELIMINARY FINDINGS

Initial examinations of photos obtained from the Kern County Department of Public Works indicated that the property had a history of scrapping operations dating back to at least the 1950's. Details discernible in these photographs indicate that the facility progressively grew in metals handling capability and capacity through the years. Transportation of metals off-site, as well as the removal of auto shredder fluff generated

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during separation operations, indicates that environmental concerns related to these products were not a historical problem at the property but rather became a greater concern after Golden State began stockpiling all such material in the 1980's.

Environmental concerns found to be site related due to current or past practices are generally related to existing machinery onsite, and to the storage and disposal of materials remaining onsite. Additional preliminary work conducted during record reviews, personnel interviews, site examination, and regulatory discussions indicate that the property contains hazardous wastes, which the regulatory authorities are aware. The auto shredder fluff pile is the most obvious source of contaminants onsite, however, the preliminary audit uncovered other suspect areas in need of investigation. Specifically, underground tanks exist which have not been tested for integrity; waste oil either had been dumped on the ground or used as a lubricant in the shearing machine, and PCB-containing "white goods" had been stored and processed in the scrapping operation.

5.2 SURFACE SAMPLING

Evidence of surface staining due to indiscriminate waste oil dumping is widespread. Investigation of quantities of

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contaminated materials for these areas was not the focus of this investigation. Quantities of waste oil contaminated soil are easily identifiable by inspection. The subsurface sampling program addressed the possibility of migration of surficial contaminants and is discussed in Section 5.3. Surficial grab sampling was limited to only the shredder fluff and run-off water.

5.2.1 Grab Samples-PCB Results

Grab samples were obtained from the auto waste shredder fluff pile in nine locations by Mittelhauser personnel. Sample locations are shown in Figure 4.2. All samples retrieved from the fluff pile were found to contain PCBs below Federal and State action levels at 50 ppm. Two types of PCB, identified as PCB-1232 and PCB-1254, were found. No other type of PCB was detected in the samples.

PCB 1232 concentrations ranged from a low of 8.43 ppm to a high of 26.6 ppm. PCB 1254 concentrations ranged from a low of non-detected to a high of 14.10 ppm. Total PCB concentrations ranged from a low of 8.43 ppm in sample 1212-02-P02, to a high of 37.80 ppm in sample number 1212-02-07. The mean concentration for the sample group was 26.56 ppm; the variance was 102.62 ppm, and the standard deviation was 10.13 ppm. Table 5-1 provides a summary of PCB sample results.

TABLE 5-1

Summary of PCB Analytical Results
 Golden State Metals, Bakersfield, California
 (Units are in ug/g)

Sample No.	PCB 1016	PCB 1221	PCB 1232	PCB 1242	PCB 1248	PCB 1254	PCB 1260	TOTAL PCB
1212-02-P01A	nd	nd	8.55	nd	nd	6.24	nd	14.79
1212-02-P02A	nd	nd	8.43	nd	nd	nd	nd	8.43
1212-02-P03A	nd	nd	14.70	nd	nd	12.90	nd	27.60
1212-02-P04A	nd	nd	21.50	nd	nd	8.40	nd	29.90
1212-02-P05A	nd	nd	14.60	nd	nd	12.80	nd	27.40
1212-02-P06A	nd	nd	23.10	nd	nd	14.10	nd	37.20
1212-02-P07A	nd	nd	26.60	nd	nd	11.20	nd	37.80
1212-02-P08A	nd	nd	15.40	nd	nd	5.61	nd	21.01
1212-02-P09A	nd	nd	22.90	nd	nd	12.00	nd	34.90

Note: nd = None detected below the minimum reporting level of 1.0 ug/g. (EPA Method 8080).

mean = 26.56 ug/g
 variance = 102.62
 standard deviation = 10.13

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Given the wide distribution of PCB concentrations as given in Table 5-1 (8.43 ppm to 37.80 ppm), statistical analysis was performed on the sample valves per EPA's SW-846: "Test Methods for Evaluating Solid Waste". The calculations are presented in Appendix D.

Based upon this statistical analysis, the levels of PCB's at the Golden State site are statistically below the regulatory threshold of 50 ppm of PBC's in soil.

5.2.2 Grab Samples--Metals Results

Grab samples were analyzed by Total Threshold Limit Concentration (TTLC) and Soluble Threshold Limit Concentration (STLC) parameters for cadmium, lead, copper, nickel, and zinc. Samples analyzed for TTLC metal parameters indicate that three metal constituents exceed regulatory guidelines. Sample 1212-02-P02 was found to contain copper at 4,160 ppm; the TTLC limit is 2,500 ppm. All samples except 1212-02-P04 were found to exceed the TTLC limit for lead which is 1,000 ppm. Test results for lead ranged from 957 ppm in 1212-02-P04 to 4,400 ppm in sample 1212-02-P02. Seven of the nine samples were also found to exceed TTLC limits of 5,000 ppm for zinc. Concentrations as high as 27,500 ppm, from 1212-02-P01, were recorded.

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STLC concentrations for three metals were also exceeded in the grab samples. Four samples exceeded the STLC limit of 1.0 ppm for cadmium. Of these samples, the highest value was 3.28 ppm. All samples had concentrations exceeding the STLC limit of 5.0 ppm for lead. Concentrations ranged from a low of 47.4 ppm in 1212-02-P08, to a high of 257 ppm in 1212-02-P03. All samples also exceeded the STLC limit of 250 ppm for zinc. The test concentration result was found in sample 1212-02-P04, which contained 397 ppm zinc. The highest concentration, 985 ppm, was found in 1212-02-P08. Table 5-2 contains a summary of all concentrations exceeding TTLC and STLC limits, as well as a listing of TTLC and STLC limits.

At the request of the client, Mittelhauser took several samples of the Auto Shredder Fluff to be analyzed for total metal percentages by weight. This information will be useful in determining the feasibility of waste reprocessing in the future. To accomplish this, the waste samples were first burned at 600 C then subject to acid digestion. The method was arranged by Mittelhauser and the laboratory and has no given name or method number. The metal content of the fluff pile is estimated to average 26.2 percent by weight for the sample group. Sample 1212-02-P04a was found to have the smallest percent metal, approximately 22.3 percent, whereas sample 1212-02-P03a contained

TABLE 5-2

GRAB SAMPLES STLC AND/OR TTLC LABORATORY
RESULTS FOR FIVE METALS (PPM)

SAMPLE #S	REG LIMIT	PO1	PO2	PO3	PO4	PO5	PO6	PO7	PO8	PO9	HO1
TTLC											
Cadmium	100	38.3	64.7	36.5	22.2	32.1	37.6	36	36.5	33.3	<.5
Copper	2500	437	4160	2190	1180	463	862	1220	1070	871	8840
Lead	1000	1720	4400	3770	957	2440	2360	2390	2020	2560	2450
Nickel	2000	186	315	403	88.6	213	496	424	378	296	1310
Zinc	5000	27500	11900	15800	3910	10200	9740	33.5	11700	9440	8650
STLC											
Cadmium	1.0	0.46	<.1	3.25	<.1	<.1	2.53	3.28	0.22	2.57	3.02
Copper	25	2.94	<.1	17.5	<.1	<.1	4.97	3.71	3.96	2.39	1.66
Lead	5.0	126	68.8	257	116	56.6	132	126	47.4	96.6	108
Nickel	20	9.06	6.246	8.67	5.01	6.71	10.9	11.4	6.57	7.47	12.8
Zinc	250	671	491	797	397	722	638	985	920	893	625

*All are prefixed with 1212-02-

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the highest percent - 30 percent, of metals in the sample group. Metal digestion results are shown in Table 5.3.

5.2.3 Sample Location H

An additional grab sample was collected from the fluff pile located immediately adjacent to the non-ferric cyclone. Waste material from this area is removed daily and transferred to the main auto shredder fluff pile. Sample 1212-02-H01 was collected two feet into a fresh cut face, approximately four feet below the pile surface, at the non-ferric cyclone. The sample was split and analyzed for PCBs and TTLC and STLC of five metals; cadmium, copper, lead, nickel, and zinc. TTLC limits were exceeded for copper, lead, and zinc with respective concentrations of 8,840 ppm, 2,450 ppm, and 8,650 ppm. STLC limits were exceeded for the same constituents with results of 3.02 ppm, 108 ppm, and 625 ppm following the same order. Additional sample information is shown in Appendix C (Sample Analysis Summary).

5.2.4 Water Sample

A fluid sample was collected to characterize the leachate generated by the auto shredder fluff pile. No PCBs were reported from the sample. STLC metal constituents analyzed were

TABLE 5-3

Loss on Ignition, Acid Insoluble, and Metal of Fluff Pile
Golden State Metals, Bakersfield, California
(Percent by Weight)

Sample No.	% Loss on Ignition at 600 deg. Cent.	% Acid Insoluble Siliceous Material	% Metal (calculated)
1212-02-PC1A	49.9%	24.1%	26.0%
1212-02-PC2A	45.0	27.6	27.4
1212-02-PC3A	28.5	41.5	30.0
1212-02-PC4A	50.7	27.0	22.3
1212-02-PC5A	46.1	29.1	24.8
1212-02-PC6A	25.5	44.7	29.8
1212-02-PC7A	35.3	38.2	26.5
1212-02-PC8A	42.8	34.3	22.9
1212-02-PC9A	35.8	38.1	26.1

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found in concentrations of less than ten percent of the regulatory limit established by the State Department of Health Services. See Table 5-4 for a summary of all fluff pile, area H and leachate analytical results.

5.3 SUBSURFACE SAMPLING

5.3.1 Sample Location A (Underground Storage Tanks)

Samples 1212-02-A01 and -A02 were collected from the shallow surface intervals at 10 and 20 feet in Boring A. Both were analyzed for waste oil and gasoline TPH by EPA methods 418.1 and 8015 respectively. Test results for gasoline were non-detectable, while waste oil hydrocarbons were detected at 65 ppm and 63 ppm. Further sampling and analysis was conducted at 50 and 100 feet. Samples were analyzed for TPH (waste oil) only, and results of 77 ppm and 71 ppm, respectively, were reported. Table 5-5 shows a summary of analytical results for this area.

5.3.2 Sample Location B (Larsen Separator)

Concerns related to leaching of waste metals and PCBs from the storage of 'white goods' led to the placement of a

TABLE 5-4

SUMMARY OF ANALYTICAL RESULTS FROM
AUTO SHREDDER WASTE (FLUFF)

Sample Number	EPA Method	H01	I01 Leachate	P01	P02	P03	P04	P05	P06	P07	P08	P09
Date Collected		09/08/89	NA	09/06/89	09/06/89	09/06/89	09/06/89	09/06/89	09/06/89	09/06/89	09/06/89	09/06/89
Analytical Parameters:												
PCB-1016	8080	<1	NA	<1	<1	<1	<1	<1	<1	<1	<1	<1
PCB-1121	8080	<1	NA	<1	<1	<1	<1	<1	<1	<1	<1	<1
PCB-1132	8080	<1	NA	8.55	8.43	14.7	21.5	14.6	23.1	26.6	15.4	22.9
PCB-1142	8080	<1	NA	<1	<1	<1	<1	<1	<1	<1	<1	<1
PCB-1148	8080	13.1	NA	<1	<1	<1	<1	<1	<1	<1	<1	<1
PCB-1154	8080	<1	NA	6.24	<1	12.9	8.4	12.8	14.1	11.2	5.61	12
PCB-1160	8080	<1	NA	<1	<1	<1	<1	<1	<1	<1	<1	<1
Cadmium, total	6010	<1.5	NA	58.3	64.7	36.5	22.2	32.1	37.6	36	36.5	33.3
Copper, total	6010	8840	NA	437	4160	2190	1180	463	862	1220	1070	871
Lead, total	6010	2450	NA	1720	4400	3770	957	2440	2360	2390	2020	2560
Nickel, total	6010	1310	NA	186	315	403	88.6	213	496	424	378	296
Zinc, total	6010	8650	NA	27500	11900	15800	3910	10200	9740	33.5	11700	9440
Cadmium, soluble	6010	3.02	<0.01	0.46	<1	3.25	<1	<1	2.53	3.28	0.22	2.57
Copper, soluble	6010	1.66	0.04	2.94	<1	17.5	<1	<1	4.97	3.71	3.96	2.39
Lead, soluble	6010	108	0.16	126	68.8	257	116	56.6	132	126	47.4	96.6
Nickel, soluble	6010	12.8	0.37	9.06	6.246	8.67	5.01	6.71	10.9	11.4	8.57	7.47
Zinc, soluble	6010	625	0.25	671	491	797	397	722	638	985	920	893

NA = Not Analyzed
P101TB

TABLE 5.5
Summary of Sample Analysis Results
Areas "A" and "G"
Underground and Above-ground Tanks

Results in ug/l

Sample Number	EPA Method	A01	A02	A03	A04	G01	G02	G03	G04
Media		Soil	Soil	Soil	Soil	Soil	Soil	Soil	Soil
Depth		10'	20'	30'	40'	10'	20'	30'	40'
Date Collected		09/08/89	09/08/89	09/08/89	09/08/89	09/08/89	09/08/89	09/08/89	09/08/89
Analytical Parameters:									
Total Petroleum Hydrocarbons (Waste Oil)	418.1	65	63	77	73	71	29313	NA	NA
Total Petroleum Hydrocarbons (Gasoline)	8015	<5	<5	NA	NA	<5	89.22	23.06	<5

NA = Not Analyzed
(P181273)

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boring in Sample Location B by the Larsen Separator. Samples 1212-02-B01, -B02, and -B04 were collected from depths of 10, 20, and 100 feet. All volatile and semi-volatile organic constituents were non-detectable, as were all PCB constituents. All STLC and TTLC results for the metals analyzed were less than ten percent of the regulatory limit. Table 5-6 shows a summary of analytical results for this area.

5.3.3 Sample Location C (Shearing Machine)

Boring C was advanced directly in front of the shearing machine on the eastern margin of the property. Type 1248 PCBs were discovered in both samples 1212-02-C01, and -C02 at concentrations, respectively, 17.9 ppm and 5.97 ppm. Results of TPH analyses for these samples were 47,995 ppm at 10 feet depth, and 36,912 ppm at 20 feet in depth.

Sample 1212-02-C04, recovered from a depth of 100 feet was analyzed for TPH, PCBs, volatile and semi-volatile aromatics. TPH results were 184 ppm. Both volatile and semi-volatile aromatic hydrocarbon analyses resulted in no detection of any constituent. PCBs were not reported. Table 5-7 shows a summary of analytical results.

TABLE 5-6

SUMMARY OF ANALYTICAL RESULTS FROM SAMPLE LOCATION "B"
LARSEN SEPARATOR

Sample Number	EPA Method	B01	B02	B04
Media		Soil 10'	Soil 20'	Soil 40'
Depth				
Date Collected		09/07/89	09/07/89	09/07/89
Analytical Parameters:				
Total Petroleum Hydrocarbons (Waste Oil)	418.1	227	64	69
PCB-1016	8080	<1	<1	<1
PCB-1221	8080	<1	<1	<1
PCB-1232	8080	<1	<1	<1
PCB-1242	8080	<1	<1	<1
PCB-1248	8080	<1	<1	<1
PCB-1254	8080	<1	<1	<1
PCB-1260	8080	<1	<1	<1
Cadmium, total	6010	<.5	<.5	NA
Copper, total	6010	14.3	22.2	NA
Lead, total	6010	<2.5	<2.5	NA
Nickel, total	6010	3.18	10.2	NA
Cadmium, soluble	6010	<.1	<.1	NA
Copper, soluble	6010	0.35	0.18	NA
Lead, soluble	6010	<.5	<.5	NA
Nickel, soluble	6010	<.5	<.5	NA
Zinc, soluble	6010	0.37	0.34	NA

NA = Not Analyzed
[P1212TA]

TABLE 5-7

SUMMARY OF ANALYTICAL RESULTS FROM SAMPLE LOCATION "C"
SHEARING MACHINE

Sample Number	EPA Method	C01	C02	C04
Media		Soil	Soil	Soil
Depth		10'	20'	40'
Date Collected		09/07/89	09/07/89	09/07/89
Analytical Parameters:				
Total Petroleum Hydrocarbons (Waste Oil)	418.1	47995	36912	184
PCB-1016	8080	<1	<1	<1
PCB-1221	8080	<1	<1	<1
PCB-1232	8080	<1	<1	<1
PCB-1242	8080	<1	<1	<1
PCB-1248	8080	17.9	5.97	<1
PCB-1254	8080	<1	<1	<1
PCB-1260	8080	<1	<1	<1

[P1212TE]

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5.3.4 Sample Location D (South of Shredder Waste Pile)

Boring D, located at the southern, central margin of the auto shredder waste pile, was advanced to a total depth of 130 feet. No ground water was encountered by this boring.

Four samples were chosen for analysis from this boring. Shallow samples, 1212-02-D01 and -02, were collected from depths of 10 and 20 feet. TPH values were 50.6 ppm and 62.5 ppm, respectively. Neither sample was found to contain PCBs. Neither STLC or TTLC limits for cadmium, copper, lead, nickel, and zinc were exceeded. No test result for the five metals detailed above exceeded ten percent of the TTLC or STLC regulatory limits.

Sample 1212-02-D05 was recovered at a depth of 50 feet, and 1212-02-D06 was collected at a depth of 60 feet. All aromatic constituents were non-detectable. TPH values were reported at 61 ppm and 35 ppm, respectively. PCBs were not found in either sample. Table 5-8 shows a summary of analytical results for the shredder waste pile.

TABLE 5-8

SUMMARY OF ANALYTICAL RESULTS FROM SAMPLE LOCATION "D", "E", "F", AND "I" AUTO SHREDDER WASTE PILE AREA										
Sample Number	EPA Method	D01	D02	D05	D06	E01	E02	F01	F02	I01
Media		Soil	Soil	Soil	Soil	Soil	Soil	Soil	Soil	Water
Depth		10'	20'	50'	60'	10'	20'	10'	20'	Surface
Date Collected		09/07/89	09/07/89	09/07/89	09/07/89	09/07/89	09/07/89	09/08/89	09/08/89	09/08/89
Analytical Parameters:										
TPH (Waste Oils)	418.1	50.6	62.5	61	35	186	27	83	23	
PCB-1016	8080	<1	<1	<1	<1	<1	<1	<1	<1	<1
PCB-1221	8080	<1	<1	<1	<1	<1	<1	<1	<1	<1
PCB-1232	8080	<1	<1	<1	<1	<1	<1	<1	<1	<1
PCB-1242	8080	<1	<1	<1	<1	<1	<1	<1	<1	<1
PCB-1248	8080	<1	<1	<1	<1	<1	<1	<1	<1	<1
PCB-1254	8080	<1	<1	<1	<1	<1	<1	<1	<1	<1
PCB-1260	8080	<1	<1	<1	<1	<1	<1	<1	<1	<1
Cadmium, total	6010	<.5	<.5	NA	NA	<.5	<.5	<.5	<.5	NA
Copper, total	6010	70.5	21.5	NA	NA	27.5	24.8	26.4	7.94	NA
Lead, total	6010	4.24	<2.5	NA	NA	4.46	<2.5	21.8	<2.5	NA
Nickel, total	6010	37.6	11.1	NA	NA	27.9	10.3	14.9	4.17	NA
Zinc, total	6010	158	71.2	NA	NA	84.7	65.4	135	24.1	NA
Cadmium, soluble	6010	<.1	<.1	NA	NA	<.1	<.1	<.1	<.1	<.01
Copper, soluble	6010	0.42	0.14	NA	NA	0.32	0.2	1.11	0.48	0.04
Lead, soluble	6010	<.5	<.5	NA	NA	<.5	<.5	1.57	<.5	0.16
Nickel, soluble	6010	0.52	<.5	NA	NA	0.89	<.5	0.52	<.5	0.37
Zinc, soluble	6010	0.89	0.22	NA	NA	1.12	0.26	13.3	0.29	0.25

NA Not Analyzed
(Field Test)

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5.3.5 Sample Locations E and F (West and East of Shredder
Waste Pile)

Samples were collected and analyzed from both borings at depths of 10 and 20 feet. TPH concentrations for Boring E were 186 ppm and 27 ppm, respectively. TPH values for Boring F were 83 ppm at 10 feet, and 23 ppm at 20 feet. No PCBs were detected in any of the samples retrieved from these borings. None of the samples contained concentrations of metals within ten percent of their respective TTLC or STLC regulatory limits. See Table 5-8 for a summary of analytical results for E and F locations.

5.3.6 Sample Location G (Underground Fuel Tanks)

Boring G was advanced adjacent to the underground fuel tanks. Four samples, 1212-02-G01, -G02, -G3, and -G4, were collected and analyzed for TPH using EPA Method 8015 and 418.1. Results from the sample collected at 20 feet were 29,313 ppm TPH as waste oil, and 89.22 ppm TPH as gasoline. Samples collected from the depths of 30 and 40 feet were analyzed using the LUFT method for purgeable aromatics due to the greater mobility of gasoline constituents. Results were 23.04 ppm for the 30-foot depth sample, and non-detectable for the 40-foot depth sample.

SECTION 6.0

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SECTION 6.0
INTERPRETATIONS

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6.0 INTERPRETATIONS

Data recovered from surface and subsurface sample analysis was received and the results interpreted. Both the presence or absence of contaminants provide information relative to the site characterization. Data was reviewed for correlation and cross-checked. In this investigation, the type and concentration of contaminants found can be used to postulate source points and possible migration pathways. The absence of contaminants can further be used to evaluate the possibility of future problems.

6.1 PCB RESULTS

Relatively low values of PCBs were discovered to be present at the surface in two different areas at the facility, as well as, in one subsurface location. Several different types of PCB's have been found at the site indicating different PCB sources. Grab samples recovered from the auto shredder fluff pile contained PCBs of two types--PCB 1232 and PCB 1254. A grab sample recovered from the ferric cyclone was found to contain PCB 1248. Additionally, PCB type 1248 was found in samples obtained from Boring C at depths of 10 and 20 feet next to the metal shearer location. Interpretation of this information is limited by the

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total number of samples which were collected and analyzed. Although additional sampling is necessary to better quantify the PCBs present in the fluff material, our initial survey shows that PCBs are below Federal and State action levels. PCBs present in soils below the shearing machine are also found in quantities below the 50 ppm action levels. These contaminants can confidently be linked to the waste oil spillage in that area.

6.2 TPH RESULTS

TPH concentrations reported for subsurface samples were found to range between 20-75 ppm in most of the samples analyzed. Exceptions were those samples with definite impacted status, such as the samples with hydrocarbon contents in the thousands, and two samples with TPH values in the low hundreds. High concentrations of TPH can confidently be linked to point sources at the site which will probably require more complete characterization and clean up in the near future. Low concentrations, on the order of 100 to 200 ppm, are more problematic, and may either be linked to point sources or to natural effects and may not necessarily require clean up. The widespread occurrence of low levels of TPH is also difficult to explain. Low levels of TPH may exist naturally as background in the soils of this area or soils may in fact have been impacted by surface spilling. As the

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Bakersfield area is known to contain some of the highest natural concentrations of petroleum in the United States, it may be possible that background concentrations of approximately 50 to 70 ppm do exist naturally.

The evaluation of TPH results in borings near the underground tank locations are conclusive. Diesel, gasoline, and waste oil tanks exist in this area. Mittelhauser personnel noted the presence of what appeared to be waste oil odors in Boring A, and gasoline odors in Boring G. Laboratory results identified the presence of gasoline in Boring A, and showed only background concentrations of "waste oil" TPH which contradicts field observations. Boring G detected elevated concentrations of waste oil TPH and detected lesser concentrations of "gasoline" hydrocarbons. Two situations could be interpreted from the test results in Boring G. A small amount of gasoline may have leaked and mingled with the waste oil, or a small percentage of waste oil constituents are naptha-type hydrocarbons. The latter explanation is the more probable of the two, but either or both may have occurred here. In either case, the tank or tanks have leaked and hydrocarbons are present in the soil at elevated amounts. Section 7.3 discusses implications of this investigation and what should be done about the TPH contaminated soils.

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6.3 METALS RESULTS

Several metal constituents are present in auto shredder fluff that classify this material as a hazardous waste. Cadmium, copper, lead, and zinc are all present in levels above TTLC and STLC limits. It is probable that the zinc came from galvanized steel; that the copper came from wire, and that the lead possibly came from unreclaimed batteries, radiators, solder and casings. The cadmium source is not known.

The shallow soils samples analyzed for STLC and TTLC metals showed the presence of copper, lead, nickel, and other metal constituents at concentrations well below the regulatory limits. In most cases these metals were present in amounts ranging from one to ten percent of the STLC or TTLC limit. These analyses indicate that while these substances may have migrated vertically near the shredder waste, soils have not been highly impacted. It is also possible that the amounts of these metals found are representative of normal background in this area. No remediation of soils below ten feet is warranted by these results.

Results of metal digestion tests indicate that the amount of metal in the shredder fluff averages approximately 25 percent. Since only small amounts of non-ferrous metals were

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determined to be present in the STLC and TTLC analyses, it appears that the bulk of these metals are probably ferrous in nature. However; further investigation of this material as a recyclable product should be undertaken, as treatment to remove metals could possibly render the fluff non-hazardous. The production of a product in the process could defray expenses, as well as providing a direction for treatment.

SECTION 7.0

SAMPLE ANALYSIS RESULT SUMMARY 1/2

[illegible]

SAMPLE ANALYSIS RESULT SUMMARY 2/2

[illegible]

6

CONTAMINATION INVESTIGATION AND REMEDIATION PLAN

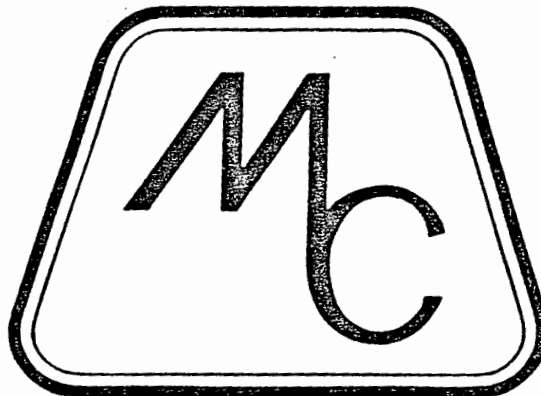
GOLDEN STATE METALS FACILITY
KERN COUNTY CALIFORNIA

Prepared for:

HIUKA AMERICA CORPORATION
BAKERSFIELD, CALIFORNIA

Prepared by:

MITTELHAUSER CORPORATION
BAKERSFIELD, CALIFORNIA



AUGUST 1991

Golden State Metals, Inc.
Investigation & Remediation Plan
Kern County, California

August 1991
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EXECUTIVE SUMMARY

A detailed work plan is presented herein to investigate and remediate past contamination at the Golden State Metals, Inc. facility located at 2000 East Brundage Lane in the city of Bakersfield, Kern County, California. The detailed work plan was requested by the State of California Department of Health Services, Toxic Substances Control Program in a letter dated February 26, 1991. The Department letter specifically asked that the work plan address: (1) underground storage tanks, (2) surface contaminated soil, and (3) soil beneath the auto shredder waste pile.

The Golden State Metals facility is situated on approximately 13.7 acres of relatively flat terrain on the east side of the city. The primary business of Golden State Metals is the shredding of automobiles and other metallic objects for the recovery of scrap iron. Groundwater is said to occur approximately 190 to 200 feet below ground surface.

Three underground storage tanks were removed by Golden State Metals in March 1990. A site mitigation plan for capping and sealing the surface above the tank location was submitted and approved by Kern County Environmental Health Services Department. Mitigation of the tank location was completed in November 1990.

Previous work identified the shearing machine as an area of concern for surface contaminated soil. High concentrations of Total Petroleum Hydrocarbons (TPH) were detected to a depth of 20 to 40 feet. Drilling, soil sampling, and laboratory analysis are proposed in the work plan for defining the vertical and lateral extent of migration for this area of the facility.

Previous work at the waste pile included drilling and sampling on the south, east, and west sides of the pile. Drilling, soil sampling, and laboratory analysis are proposed in the work plan for defining the vertical extent of migration in the footprint area of the pile. The schedule for implementing the footprint area investigation is uncertain because the pile poses a restriction to access the area.

Remedial alternatives and the need to remediate portions of the site will be addressed in the report or reports stemming from implementation of this work plan.

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CONTAMINATION INVESTIGATION AND REMEDIATION PLAN
FOR
GOLDEN STATE METALS FACILITY
KERN COUNTY, CALIFORNIA

This document presents plans to remediate past contamination at the Golden State Metals (GSM) facility located at 2000 Brundage Lane, Bakersfield, California. The site remediation plan was prepared using the RCRA Facility Investigation Plans (RFI) as a guidance document at the request of the State of California, Department of Health Services (DHS), Toxic Substances Control Program in their letter dated February 26, 1991:

"By August 1, 1991, GSM shall submit a detailed plan to remediate the past contamination at the site. This plan would expand on the report 'Hiuka America Corporation/Golden State Metals Assessment' prepared by Mittelhauser Corporation, dated April 1990. The plan shall follow the enclosed 'General Requirements for RCRA Facility Investigation Plans'. The remediation plan will identify: (1) the removal of the underground storage tanks at GSM along with the removal or treatment of the contaminated soil around the storage tanks; (2) the removal or treatment of surface contaminated soil; and (3) remediation of the soil underneath the stockpile [of auto shredder waste]."

The "General Requirements for RCRA Facility Investigation Plans" has been used as a guide in preparing the site investigation and remediation plan. The plan is tailored to address the needs of the GSM facility and to satisfy the intent of the DHS request for remediating past contamination at the site.

SECTION 1

MITTELHAUSER
Corporation

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1.0 DESCRIPTION OF CURRENT CONDITIONS

1.1 FACILITY BACKGROUND

The facility occupies a parcel of approximately 13.7 acres in the southeast quarter of Section 33, T29S, R28E, MDBM. The geographic location of the GSM facility is shown on Figure 1. The facility is situated on the north side of Brundage Lane near the intersection with Mt. Vernon Avenue. The nearest residential neighborhood is located approximately 0.5 miles north of GSM. The primary business of GSM is shredding automobiles and other materials for scrap-iron recycling. The facility also reclaims lead-acid batteries, aluminum cans, and waste paper.

The site has a surface elevation of between 385 to 390 feet above sea level. The topography is relatively flat and slopes gently to the south at an approximate gradient of 30 feet per mile. No natural surface drainage channels occur within at least a mile or more of the facility. The man-made East Side Levee is the closest body of surface water and is located one mile north of the site. No production or groundwater monitoring wells are situated on the property. One boring (Boring D) drilled by Mittelhauser Corporation for the environmental assessment work did not encounter groundwater above the depth of 130 feet. According to the Kern County Water Agency report on water conditions in Improvement

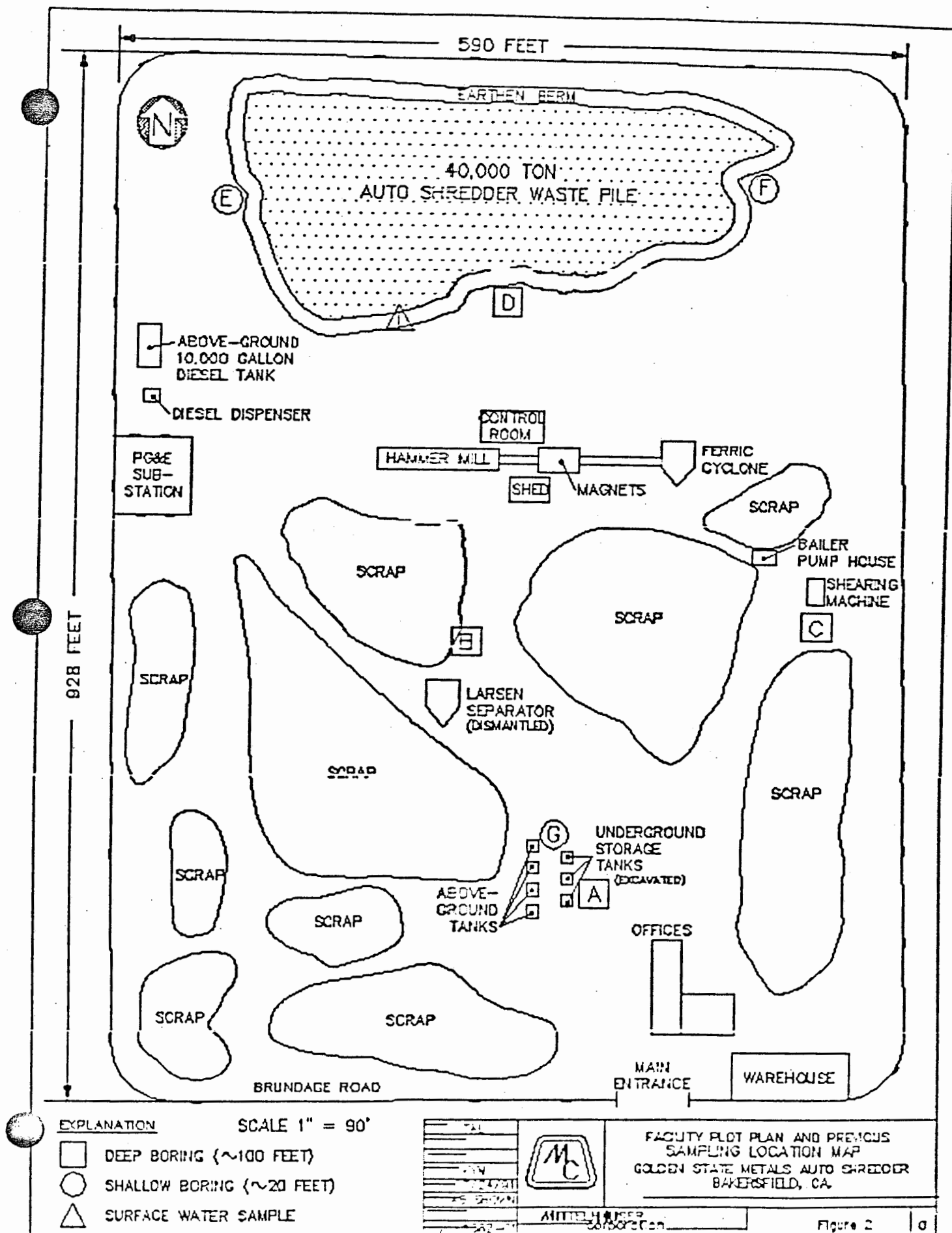
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District No. 4, the depth to groundwater beneath GSM in the spring of 1989 was approximately 190 to 200 feet below ground surface.

The GSM site has been active since the mid-1950's when it began operations as a scrap yard. In 1966, the operations expanded to include auto shredding operations. In 1968, K & D Salvage became the owner/operator of the facility. In the late 1970's, Golden State Metals became the owner/operator of the facility. In 1990, GSM was purchased by Hiuka America Corporation which is the present owner/operator of the facility.

Figure 2 shows the approximate layout of the GSM facility. The northern third of the site is occupied by a pile of auto shredder waste approximately 75,000 cubic yards in volume. One hundred feet south of the pile is the auto shredder which consists of a hammer mill, magnetic separator, ferrous and non-ferrous Z-box separators, and ferrous and non-ferrous cyclone separators. A Larsen separator existed near the center of the property, but it was dismantled in 1990. The boiler pump house and shearing machine are located approximately 100 feet southeast of the auto shredder. Three 300-gallon and one 100-gallon above-ground fuel storage tanks are located in the south central part of the facility. Three underground fuel storage tanks existed next to the above-ground tanks, but the former were removed in March 1990. A 10,000-gallon



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above-ground diesel fuel storage tank is located in the northwest part of the facility. The main office, weigh station, and warehouse are located near the main entrance to the facility in the southeast portion of the property. The majority of the site is occupied by piles of scrap metal, the locations and sizes of which change constantly. A small percentage of the site is covered by asphalt or concrete; the majority of the site surface is covered by native soil.

The auto shredding process is shown in the block diagram in Figure 3. Automobiles are feed into the auto shredder hammer mill at a rate of approximately 50 tons per hour. A controlled water spray system controls temperature and dust generated by the hammer mill. The shredded material next passes a magnetic drum which separates the material into a ferrous stream and a non-ferrous stream.

The ferrous stream passes into a ferrous Z-box separator which separates large pieces of auto shredder waste (less than 1% of total weight) from the iron product. The auto shredder waste then enters a cyclone to remove air from the solids.

WRECKED
AUTO BODIES
AND TIN GOODS

PTO 5013001

HAMMER MILL

PRIMARY
MAGNETIC
SEPARATOR

FERROUS
MATERIAL

PICKING
AREA

EXHAUST TO
ATMOSPHERE

CYCLONE

RECYCLE
FINES

"Z"-BOX
(AIR CLASSIFIER)

FERROUS
MATERIAL

SHREDDED
METAL
STORAGE

NONFERROUS
MATERIAL

FERROUS
MATERIAL

ATC 5013003

"Z"-BOX
(AIR CLASSIFIER)

HEAVY
MATERIAL

SECONDARY
MAGNETIC
SEPARATOR

NONFERROUS
MATERIAL

LIGHT
MATERIAL

CYCLONE

TROMMEL

SORTING
TABLE

NONFERROUS
MATERIAL

NONFERROUS
METAL
STORAGE
AREA

RECYCLE
AIR TO
"Z"-BOX

SHAKER

LARGE
FIBROUS
MATERIAL

FINES

ATC 5013004

TO TREATMENT

EXHAUST
TO
ATMOSPHERE

FIBROUS
MATERIAL

PLASTIC &
RUBBER
MATERIAL
STORAGE

DESIGNED BY LCM
DRAWN BY KYM
DATE 5/28/81
SCALE NONE
JOB NO. 3820201
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GOLDEN STATE METALS, INC.
BLOCK PROCESS FLOW DIAGRAM
METAL RECOVERY OPERATION

MITTELHAUSER
Corporation

DOC NO.

FIGURE 7

REV

MITTELHAUSER
corporation

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The non-ferrous stream from the magnetic separator is fed into the non-ferrous Z-box at the rate of approximately 8.75 tons per hour. The non-ferrous Z-box separates the material into a metal stream (small pieces of iron, copper, brass, and aluminum) and a non-metal stream (auto shredder waste). The metal stream passes through a secondary magnet to remove iron and the remaining non-ferrous metal is hand sorted and deposited into various bins. The non-metal stream (auto shredder waste) is feed into a cyclone at the rate of 7,200 pounds per hour to remove air. (GSM has applied for a permit modification to increase the feed rate to 10,500 pounds per hour.) The auto shredder waste next passes across a shaker screen which separates coarse material (greater than 1 inch) from fine material (less than 1 inch). The fine material goes to a pug mill into which water, cement, and a proprietary chemical called K20 are added to the waste to stabilize potentially hazardous concentrations of lead and other metals. The pug mill was added to the facility operation in 1991.

Prior to 1975, auto shredder waste was disposed at an off-site facility-owned landfill. Between 1975 and 1984, the auto shredder waste was transported to the China Grade and Arvin county landfills. Auto shredder waste which is presently on site has accumulated since 1984. Cannon sprinklers are used to water the pile which reduces surface and interior temperatures of the pile.

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The system is automated and capable of turning the sprinklers on as often as 5 minutes every hour. Excess water from sprinkling the pile is confined to the area by an earthen berm constructed along the perimeter of the pile.

At least two types of California-regulated hazardous wastes are generated at GSM: (1) auto shredder waste and (2) waste oil. Previous analyses of auto shredder waste detected soluble concentrations of lead in the range of 0.16 to 257 milligrams per liter (mg/L); copper of less than 0.1 to 17.5 mg/L; nickel of 0.37 to 12.8 mg/L; zinc of 0.25 to 985 mg/L; and cadmium of less than 0.1 to 3.28 mg/l. The auto shredder waste also contains nonhazardous concentrations of polychlorinated biphenol (PCB) 1232 and 1254 at maximum detected concentrations of 26.6 ppm and 14.1 ppm, respectively. The auto shredder waste is presently being treated on-line with a pug mill and additives, as mentioned previously, for stabilization of lead and other metals.

Waste oil is generated from the routine maintenance of on-site mobile equipment and stationary machinery. Prior to June 1989, waste oils were discharged directly onto the ground surface at various locations throughout the facility. Since June 1989, the waste oil is collected, stored in a 300-gallon above-ground tank in a controlled area, and removed by an oil recycler every 90 days.

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1.2 NATURE AND EXTENT OF CONTAMINATION

The February 26, 1991 DHS letter targeted three areas of for potential remedial action: (1) underground storage tanks, (2) surficial soil, and (3) soil beneath the auto shredder pile. Mittelhauser Corporation conducted subsurface drilling and sampling in an Environmental Assessment of the site. The nature and extent of contamination is discussed below.

Underground Fuel Storage Tanks

Three underground storage tanks (one 8,000-gallon diesel, one 4,000-gallon gasoline, and one 500-gallon motor oil) existed in the south central portion of the facility until they were removed in March 1990. Mittelhauser Corporation assessed the underground storage tank before their removal together with the above-ground tanks because the above-ground and underground tanks occur in the same area of the site. The assessment was performed by drilling one boring (Boring G) on the north side of the tank cluster and another boring (Boring A) on the south side of the cluster. Each boring was drilled to a total depth of 100 feet below ground surface. Boring A detected concentrations of Total Petroleum Hydrocarbons (TPH) of less than 77 ppm above the depth of 40 feet and Boring G detected 29,313 ppm TPH at the depth of 20 feet. The samples from Boring G were also analyzed for gasoline fuel hydrocarbons (EPA Method 8015-gasoline) and concentrations of 89

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ppm, 23 ppm, and less than 5 ppm were detected at the depths of 20, 30, and 40 feet, respectively. The petroleum hydrocarbons are believed to have come from the underground storage tanks as opposed to the above-ground storage tanks.

The underground storage tanks were excavated and removed on March 9, 1990 by M Construction of Bakersfield, California. The site mitigation plan was prepared by Krazan & Associates, Inc. and was approved by Kern County Environmental Health Services Department on November 8, 1990. The mitigation plan consisted of capping and sealing the abandoned tank location with 3 inches of asphalt. The abandoned tank site was mitigated according to the approved work plan on December 12, 1990. Kern County Environmental Health Services Department requires no further action at the underground tank location.

Surficial Soil

The environmental assessment work performed by Mittelhauser Corporation did not address the surficial soil layer across the site. The upper 6 to 9 inches of soil across site is disturbed from the daily movement of heavy equipment; the shifting and piling of scrap metal; and past discharges of used motor oil. The surficial soil layer contains visible debris such as metal, wire, plastic, wood, other materials, as well as oil stains. Mittelhauser focused

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on two areas for which the potential impact of waste oil on the subsurface appeared to be higher than average. These areas are the Larsen separator and the shearing machine. Both of these structures are stationary and any mismanagement of waste oil used to maintain these pieces of equipment was thought to pose the greatest potential impact on the subsurface environment.

Soil samples were collected near the Larsen separator at depths of 10 and 20 feet in Boring B. Chemical analyses of the soil samples detected normal concentrations of cadmium, copper, lead, and nickel. The concentration of Total Petroleum Hydrocarbons (TPH) was 227 ppm at 10 feet, 64 ppm at 20 feet, and 69 ppm at 40 feet.

Soil samples were collected near the shearing machine at depths of 10 and 20 feet in Boring C. Chemical analyses of the soil samples detected a concentration of PCB-1248 of 17.9 ppm at 10 feet and 5.97 ppm at 20 feet. The concentration of TPH was 49,995 ppm at 10 feet; 36,912 ppm at 20 feet; and 184 ppm at 40 feet. The lateral extent of TPH contamination was not determined and the vertical extent is more than 20 feet, but less than 40 feet. None of the samples in the area of the shearing machine were analyzed for metals or for specific organic constituents.

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Soil Beneath the Auto Shredder Waste Pile

The soil beneath the footprint of waste pile was not evaluated due to the obstacle presented by the pile. Instead, three borings (D, E, and F) were drilled on the south, west, and east sides, respectively, of the auto shredder waste pile. Soil samples were collected at depths of 10 feet and 20 feet. Chemical analyses detected minor concentrations of copper, lead, nickel, and zinc in the 10-foot sample. The TTLC and STLC concentrations in the 10-foot samples were less than 5 percent of regulatory limits. TTLC and STLC concentrations in the 20-foot samples were 10 to 90 percent lower than the respective values in the 10-foot samples. The concentration of TPH ranged from a low of 23 ppm to a high of 186 ppm. No PCBs were detected in any of the samples.

It appears that contaminants from the auto shredder waste pile did not migrate laterally from the pile. The vertical extent of potential migration beneath the footprint of the pile has not yet been evaluated because the pile is still in the way.

Boring D was extended to the total depth of 130 feet. The objective of extending Boring D was to locate the groundwater table, but difficult drilling prevented exploration below the depth of 130 feet. No groundwater was encountered above depth of 130 feet.

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1.3 IMPLEMENTATION OF INTERIM MEASURES

As discussed previously, hydrocarbon-impacted soil associated with the excavated underground tank location has been treated by capping and sealing the surface above the location with 3 inches of asphalt. Capping and sealing the ground above the tank location helps reduce the potential for petroleum hydrocarbons to experience continued migration in the vadose zone. The mitigation plan was pre-approved by Kern County Environmental Health Services Department. A copy of the letter from Kern County, dated December 12, 1990, is attached at the end of the work plan.

The Larsen separator has been dismantled and no longer constitutes a source of contaminants. The impact of contaminants on the subsurface soil next to the Larsen separator was judged to be negligible. Only a minor amount of TPH (227 ppm) was detected at the depth of 10 feet below ground surface.

No interim measure has been taken to mitigate hydrocarbon-impacted soil in the area of the shearing machine. The shearing machine area is the only area encountered to date where high concentrations of TPH have penetrated below the surficial soil layer.

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The soil beneath the auto shredder waste pile has not been adequately assessed; consequently, it is not known whether or not interim mitigation measures or remediation will be warranted. Auto shredder material produced after June 1991 is being mitigated by means of stabilizing the metal content of the waste using a pug mill and nonhazardous chemical additives. Work is progressing toward the goal of treating the pile and moving the material off-site to an approved landfill. A canon sprinkler system is used to mitigate the potential for gases and particulates being emitted into the atmosphere.

SECTION 2

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2.0 DETAILED SITE INVESTIGATION PLAN

This section describes additional work which will be accomplished in order to identify and evaluate the various remediation options available for use at the GSM facility. The data is necessary in order to characterize the source of contaminants, the degree and extent of release of hazardous constituents, and actual and potential receptors that might be affected by the release of hazardous constituents.

2.1 ENVIRONMENTAL SETTING

Adequate information is available through the Kern County Water Agency to define depth to groundwater and groundwater flow gradient and direction. The stratigraphy of the site has been investigated by a previous borehole drilling program down to the depth of 130 feet. Unless new evidence is uncovered that suggests contaminants have reached deeper levels than are presently known to exist and that could threaten groundwater quality, collecting detailed information such as groundwater monitoring, hydraulic conductivity, cation exchange capacity of the soil, and other items suggested in the RCRA Facility Investigation (RFI) Technical Requirements should not be required.

Instead, existing reports and publications will be examined for additional information such as the locations of drinking water

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supply wells and oil and gas wells as these pertain to pathways that might affect actual and potential receptors.

Information characterizing the climate in the vicinity of the facility will be acquired through existing publications and reports.

2.2 SOURCE CHARACTERIZATION

Adequate information already has been acquired which describes the concentrations of hazardous constituents in the auto shredder waste pile. Per requirements of the storage variance, the waste pile will be sampled to determine whether it is a RCRA waste or not.

No additional information is required to describe the waste associated with the shearing machine. The age of the shearing machine and the operation and maintenance of this unit is a matter of record.

2.3 CHARACTERIZATION OF RELEASE OF HAZARDOUS CONSTITUENTS

Two areas of the facility are in need of additional characterization with respect to the release of hazardous constituents in soil. These soils are beneath the auto shredder waste pile and beneath the shearing machine. The RFI Technical

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Requirements also suggest characterization of contaminants in groundwater, surface water/sediments, air, and subsurface gas.

The evidence collected from subsurface data and from literature sources suggest that contaminants have not impacted the groundwater nor is it likely to impact the groundwater in the future. Total petroleum hydrocarbons have been detected as deeply as 20 to 40 feet below ground surface. The groundwater is said to be located 190 to 200 feet below ground surface. With approximately 150 feet of clean soil separating the base of contaminant migration from the top of the groundwater table, little reason exists to suspect that groundwater has been or will be impacted by contaminants. Therefore no work to evaluate groundwater contamination is proposed in this plan.

No work is planned at this time for characterizing contamination of surface water or sediments because the closest water body is located a mile upslope of the facility. The site is relatively flat which makes negligible the potential for sediments to be transported off-site into the surrounding area.

No work is planned for characterizing contaminants in air or subsurface gas. The contaminants of concern in the auto shredder waste pile (PCBs and metals) are non-volatile and dispersion in air

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or soil gas are not at issue. The contaminants in the soil beneath the shearing machine are principally heavy-chain, non-volatile or semi-volatile hydrocarbons and are situated below ground surface.

2.3.1 Soil Beneath the Auto Shredder Waste Pile

The footprint of the pile occupies an area of approximately 1.5 acres. The footprint area will be assessed soon after the pile has been removed. The area will be assessed by drilling two borings to the depth of 50 feet to assess the possible vertical extent of contaminant migration. (Data appears to be adequate regarding characterization of the potential lateral extent of migration.)

Two soil samples will be collected at 2, 4, 7, and 10 feet below ground surface and at 5-foot intervals below the depth of 10 feet. Samples from 4, 7, 10, 30, and 50 feet will be analyzed for TPH using EPA Method 418.1. All other samples will be archived for possible follow-up analyses. Duplicates of the two samples containing the highest concentration of TPH will be analyzed additionally for volatile and semi-volatile constituents using EPA Methods 8240 and 8270 and for PCBs using EPA Method 8080.

Samples from 4 and 7 feet will be analyzed for total cadmium, copper, lead, nickel, and zinc using EPA Method 6010. Any sample

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exceeding 10 times the respective STLC values will be analyzed additionally to determine STLC concentrations. If the 7-foot sample exceeds STLC values, then deeper samples will be analyzed for TTLC concentrations until the vertical extent of migration has been adequately defined.

A second phase of drilling and sampling may be needed if a review of the first phase concludes that hazardous constituents have migrated more deeply than 50 feet.

Background concentrations of cadmium, copper, lead, nickel, and TPH will be determined by drilling 5-foot deep hand auger borings at the northeast and southwest corners of the facility. Each 5-foot samples will be analyzed according to EPA Methods 418.1 and 6010 for TPH and metals, respectively. The analytical results will be used to compare the results acquired in the footprint area of the waste pile and elsewhere on site.

2.3.2 Shearing Machine

Three borings will be drilled to the depth of 40 feet in order to define the vertical and lateral extent of TPH contamination. The borings will be placed around the location of the previously drilled borehole, Boring C. Soil samples will be collected at 2 and 5 feet below ground surface and at 5-foot depth intervals below

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the depth of 5 feet. The samples from 5, 15, 25, and 40 feet will be analyzed for TPH using EPA Method 418.1 and the remainder of the samples will be archived for possible future analyses. The two samples containing the highest concentration of TPH will be analyzed additionally using EPA Methods 8240, 8270, and 8080 in order to quantify the concentration of volatile organics, semi-volatile organics, and PCBs that may be associated with the TPH.

The 5-foot samples will also be analyzed for total cadmium, copper, lead, nickel, and zinc using EPA Method 6010 in order to evaluate what, if any, hazardous concentrations of metals are associated with the shearing machine area.

A second phase of drilling and sampling may be needed if a review of the first phase concludes that hazardous constituents have migrated more deeply than 40 feet.

2.4 POTENTIAL RECEPTORS

GSM is located in an industrial sector of the City of Bakersfield. The potential receptors of hazardous constituents include present and future land users and drinking water supplies. The investigation proposes to investigate potential receptors by contacting the Kern County Water Agency inquiring as to the locations of drinking water supply wells and actual and potential

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uses of groundwater in the site vicinity. Constituent transport fate analysis will be used to assess the potential impact of hazardous constituents on groundwater. "Interim Guidance for the Preparation of a Preliminary Endangerment Assessment Report (Department of Health Services, June 1990) will be used to assess the risk to public health of hazardous constituents in the soil.

2.5 REMEDIATION OF THE SITE

Plans for remediating past contamination at the site is not a part of this work plan due to the lack of information. The data collected during this investigation and previous investigations, however, will be reviewed and analyzed to evaluate what, if any, remedial measures should be taken to mitigate possible adverse impact on the environment and public health. Remedial alternatives and the need to remediate portions of the site will be addressed in the report or reports stemming from implementation of this work plan.

SECTION 3

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3.0 GENERAL PLAN REQUIREMENTS

RFI plan requirements suggest the development of the following plans: (1) Project Management Plan; (2) Sampling and Analysis Plan; (3) Data Management Plan; and (4) a Health and Safety Plan.

3.1 PROJECT MANAGEMENT PLAN

Mr. Takehisa Miyake is Executive Vice President of Golden State Metals, Inc. and responsible for overall operation of the facility, including compliance with state Department of Health Services requests. Assisting Mr. Miyake will be Mr. Daniel Collins of Mittelhauser Corporation. Mr. Collins is a registered and certified engineering geologist in the State of California with 19 years of experience in engineering and environmental geology. Mr. Collins will provide overall technical management of proposed work plan on behalf of Golden State Metals.

The chemical laboratory has not yet been selected. The selected laboratory will be certified by the State of California for the analytical procedures described in the Sampling and Analysis Plan. The drilling contractor has not yet been selected. The drilling contractor will be selected which: (1) maintains a medical record history of employees, (2) can provide copies of certificates of good health of employees assigned to the project; can provide copies of certificates of 40 or more hours of OSHA

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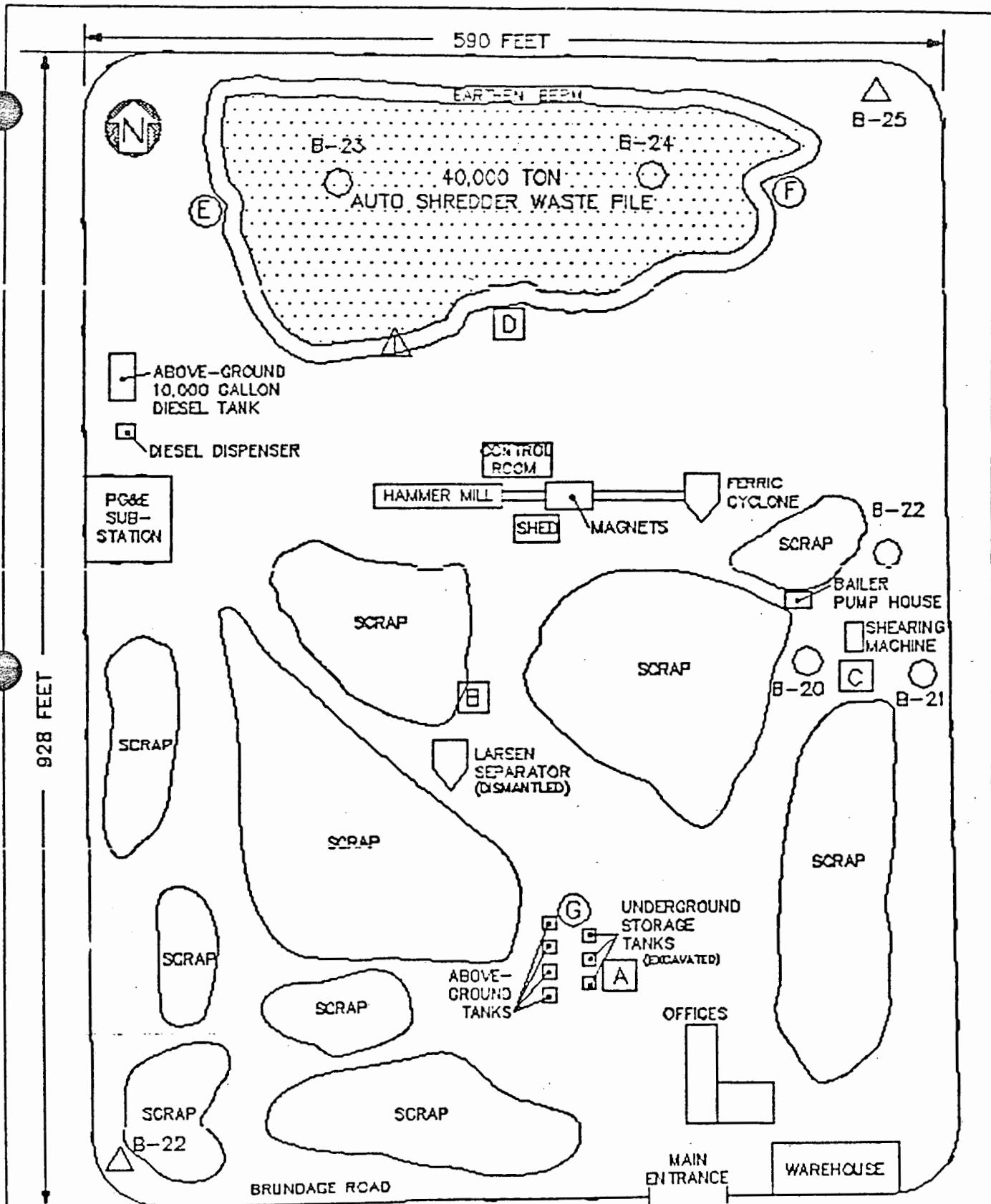
required health and safety training; and (4) has a valid C-57 state contractor's license.

Drilling and sampling in the area of the shearing machine can be accomplished by December 1, 1991. A report of investigation of the shearing machine area can be prepared by March 1, 1992.

The schedule for investigating the footprint area of the auto shredder waste pile cannot be determined at this time. The footprint area investigation can begin soon after the pile is completely removed. However, the schedule for eliminating the pile has not been adequately defined. This schedule will be set some time in the future when the time table for eliminating the pile is better defined. A separate report will be submitted after completing the footprint area investigation.

3.2 SAMPLING AND ANALYSIS PLAN

A total of 7 borings are planned for the investigation. The locations of proposed Borings B20 through B26 are shown in Figure 4. Two borings will be drilled to the depth of 50 feet in the footprint area of the auto shredder waste pile and three borings to the depth of 40 feet in the area of the shearing machine.



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Three machine drilled hollow-stem auger borings (B20, B21, and B22) will be advanced to the depth of 40 feet in the area of the shearing machine. Soil samples will be collected from depths of 2 and 5 feet below ground surface and at 5-foot depth intervals below the depth of 5 feet. The samples from 5, 15, 25, and 40 will be analyzed for TPH using EPA Method 418.1 and the remainder of the samples will be archived for possible future analyses. The two samples containing the highest concentration of TPH will be analyzed additionally using EPA Methods 8240, 8270, and 8080 in order to quantify the concentration of volatile organics, semi-volatile organics, and PCBs that may be associated with the TPH. The 5-foot samples will also be analyzed for total cadmium, copper, lead, nickel, and zinc using EPA Method 6010 in order evaluate what, if any, hazardous concentrations of metals are associated with the shearing machine area.

Two machine drilled hollow-stem auger borings (Borings B23 and B24) will be advanced on the footprint area of the auto shredder waste pile. Soil samples will be collected from the depths of 2, 4, 7, and 10 feet below ground surface and at 5-foot intervals below the depth of 10 feet. Samples from 4, 7, 10, 30, and 50 feet will be analyzed for TPH using EPA Method 418.1. All other samples will be archived for possible follow-up analyses. The two samples

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containing the highest concentration of TPH will be analyzed additionally for volatile organics, semi-volatile organics, and PCBs using EPA Methods 8240, 8270, and 8080. Samples from 4 and 7 feet also will be analyzed for total cadmium, copper, lead, nickel, and zinc using EPA Method 6010. Samples which exceed 10 times the respective STLC values will be analyzed to determine actual STLC concentrations. If the 7-foot sample exceeds STLC values, then deeper samples will be analyzed for TTLC and possibly for STLC concentrations of metals until the vertical extent of migration has been adequately defined.

Two hand-auger borings (B25 and B26) will be drilled to the depth of 5 feet in the northeast and southwest corners of the property. Samples collected at the depth of 5 feet in the hand-auger borings will be submitted for analysis in accordance with EPA Methods 418.1 and 6010 to evaluate background concentrations of TPH and metals (cadmium, copper, lead, nickel, and zinc), respectively.

Soil samples will be collected from the machine drilled hollow-stem borings using an 18-inch-long by 3-inch-wide split barrel sampler equipped with three, 6-inch-long stainless steel tubes for retaining the soil in the barrel. The sampling equipment will be cleaned prior to each sampling. Cleaning will consist of scrubbing

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the equipment with a brush in laboratory-grade detergent and distilled water to remove foreign particles. Washing will be followed by a bath rinse and a final spray rinse using distilled water. A soil sample is collected by inserting the sampler into the center of the hollow-stem augers and driving the sampler into the soil at the assigned depth through at the bottom of the string of augers. The sampler is retrieved, opened, and the three tubes containing the soil are separated. The ends of the tubes selected for chemical analysis will be sealed with a thin sheet Teflon, plastic end-caps, and tape. Each tube will then be labelled and preserved at approximately 4 degrees Centigrade for transport to the analytical laboratory on the day of collection. A chain-of-custody form will be filled out and will accompany each day's delivery to the laboratory.

All soil samples will be logged into a hard bound notebook. The location of the sample, site information, name of person collecting the sample, sample name, and other necessary information will be registered in the notebook.

Every tenth soil sample will be analyzed in duplicate to assure that analytical results are accurate and reliable to within acceptable limits of the test methods.

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One sample of final rinse of the sampling equipment will be collected and submitted for analyses for each day of sampling in the field. The rinsate sample will be analyzed for TPH, metals, and PCBs. Analysis of the final rinsate water will document that the cleaning procedures are effective for the purposes of this investigation.

3.3 DATA MANAGEMENT PLAN

Field log forms (field boring log, tailgate safety meeting, sample collection notebook) will be maintained in a project file by Mittelhauser Corporation. The specific sampling points will be assigned a unique sample number and recorded in the sample collection notebook along with other pertinent information concerning the collection of the sample. Sample collection points will be registered on a field map and distances to known reference points such as the corners of the property will be logged in the notebook. Certified analytical reports will also be maintained in the project file.

Copies of the certified analytical reports will be incorporated into reports conveying the results of the investigation. The results of the investigation will be summarized in tables and figures as appropriate.

Report of Inspection
Golden State Metals, Inc.
2000 East Brundage Lane
Bakersfield, California 93307
April 13, 1984

I. Purpose

Facility inspection to determine permittable status.

II. State Representative

Thomas W. Kovac, Department of Health Services, Fresno

III. Facility Representative

Nathan Daniels, President
Alan Daniels

IV. Facility Description and Waste Streams

Golden State Metals, Inc. is a metals reclaiming operation whereby ferrous, non-ferrous and copper metals are extracted from scrap metal products received by the facility, sorted and stockpiled prior to shipment to other industrial sites for reprocessing/recycling. The facility has never submitted a Part A Application. The facility utilizes auto shredder equipment to process the scrap metals consisting of auto bodies, refrigerators, stoves, metal roof sheeting and other miscellaneous metal products.

There are two waste streams at the facility where material is transported to Kern County operated II-2 disposal sites. Approximately 500 tons/month of waste from these two streams are generated.

1. Auto shredder "fluff" waste - This waste consists of insulation materials, foams, upholstery padding and other light and non-metallic material separated from metals on the shredder discharge conveyor by a high volume air stream.
2. Shredder waste after secondary processing - A portion of the shredder discharge stream contains a mixture of ferrous and non-ferrous metals. This material receives further sorting according to metal content and specific gravity by a secondary classifier operation. Soil residues and non-metallic substances are separated out and discharged into a 20 yrd² waste bin. When full, these bins are transported to the County dump.

V. Discussion of Inspection Findings

Representative samples were collected of the waste stream material and forwarded to the Department of Health Services lab for analysis (heavy metal scan). Large amounts of shredded metals stockpiled at the site are eventually delivered steel mills or smelters for reuse.

Some of the processed shredded metals are stored in 55 gallon drums; some having pesticide labels. Golden State Metals, Inc. receives these drums from area farmers. The farmers must certify that the drums are triple rinsed prior to delivery to the facility.

VI. Recommendations

No action is recommended until results of the sample analysis are received. It is not anticipated that the sampled wastes will be hazardous in nature. However, if the wastes are hazardous, then Golden State Metals, Inc. must completely modify its present method of waste management.

California Department of Health Services
Hazardous Materials Laboratory

HML # 1201 to

9571

LABORATORY REPORT
Metals

Collector's Name TW Kevac
Sampling Location Golden State Metals Inc.,
2000, E Sandberg Ln, Berkeley

Date Received 5/1/84
Collector's Sample # TW K004 to
TW K006

Analytical Procedure: Samples are digested with conc. nitric acid over a hot plate. The digested samples are filtered and made to 100 mL with deionized water. Metal analysis of the digests is by ICP.

"five"

HML #		9564		9570		9571
Collector's Sample #		TW000		TW005		TW006
Units		µg/g		µg/g		µg/g
As-Arsenic		8.57		5.89		10.1
Ba-Barium		1030		612		610
Cd-Cadmium		44.8		39.3		46.9
Co-Cobalt		49.3		19		18.3
Cr-Chromium		165		135		129
Cu-Copper		1440		788		3300
Ni-Nickel		830		106		257
Pb-Lead		2310		976		2470
Se-Selenium		20.8		20.4		20.4
Zn-Zinc		4620		4760		28900

Note: (<) = below limit of instrument detection
(blank) = not determined

S. Kuzum Pecan
Analyst's Signature

6/14/84 James Kevac
Date Supervisor's Signature

6/19/84
Date

HAZARDOUS MATERIALS SAMPLE ANALYSIS REQUEST

PRIORITY ☐

(Explain) _____

HML No. _____ T9

UNIT 1: FIELD SECTION

Collector _____ Date Sampled _____ Time _____ Hours _____

Activity: ☐ Enforcement ☐ ASP ☐ H.W. Property ☐ Super ☐ Other

LOCATION OF SAMPLING:

Name _____ Tel. No. _____

Address _____

HML No.
(Lab Only)

Collector's
Sample No.Type Of
Sample *

FIELD INFORMATION

Analysis Requested: _____

Chain of Custody:

1. _____	_____	_____
Signature	Title	Inclusive Dates

2. _____
Signature Title Inclusive Dates

3.	Signature	Title	Inclusive Dates
----	-----------	-------	-----------------

4. _____
Signature Title Inclusive Dates

Special Remarks _____
(e.g., duplicate sample given to company, etc.)

PART II: LABORATORY SECTION

Received By _____ Title _____ Date _____

Sample Allocation: ☐ HML ☐ SCBL ☐ LBL ☐ Other Date _____

Analysis Required

* Indicate whether sample is sludge, soil, etc.

Orig.—Lab. Dup.—File Trip.—Inspector

DEPARTMENT OF HEALTH SERVICES
TOXIC SUBSTANCES CONTROL PROGRAM
REGION 1 - FRESNO
1515 TOLLHOUSE ROAD
CLOVIS, CA 93612



Inspection Report

Golden State Metals, Incorporated
2000 East Brundage
Bakersfield, California 93387

EPA ID# CAD 982489809

Inspected by: Kit Davis, Senior Hazardous Materials Specialist
Albert Fujitsubo, Associate Hazardous Materials Specialist

Date of Inspection: 2/7/91

Date of Report: 2/13/91

I. Purpose

Response to complaint number 6-021-0083. The complaint stated the previous owners were not in compliance with hazardous waste laws. The complainant thought the facility should be re-inspected to determine if previous problems were corrected.

II. Representatives Present

Hiuka America Corporation

David E. Creigh, Executive Vice President

Golden State Metals, Incorporated

Takehisa Miyake, Executive Vice President

DHS/TSCP

Kit Davis, Senior Hazardous Materials Specialist
Albert Fujitsubo, Associate Hazardous Materials Specialist

III. Owner/Operator

Hiuka American Corporation

IV. Background

A review of the files indicates this facility was owned by Nathan Daniels. Under Mr. Daniels, the Department documented numerous violations at Golden State Metals (GSM).

CC430

These violations included: no EPA ID number; illegal storage, treatment, and disposal of hazardous waste; inadequate training program; inadequate contingency plan; lack of labeling at the waste oil tank; lack of appropriate equipment; lack of a berm around the auto fluff pile; lack of notification of local authorities; and lack of aisle space.

The Attorney General's Office has filed an action against the former owners for violations of Hazardous Waste Control Laws.

The current owners, Hiuka America Corporation (HAC), have been in control of the facility since December 14, 1989. Correspondence indicates HAC has been making an effort to comply with all unresolved violations of Hazardous Waste Control Laws.

V. General Description of the Facility

The primary function of this Site is to collect ferrous metals for recycling. Items such as auto bodies, metal appliance and steel tanks are accepted by GSM. Miyake stated about 90% of the auto bodies are stripped down to the shell. Items such as the mufflers, radiators, and the tail pipes are removed prior to being accepted. The remaining auto bodies are disassembled. The ferrous portions are put into piles on-site for shipment off-site for recycling. The remainder of materials are put onto a conveyor belt and separated further by a magnetic system, then an air current separating system. The remainder is auto shredder waste which is currently stored in a waste pile on-site.

Vehicle maintenance is done on-site. Waste oil, filters, and solvents are generated by this activity. The waste oil is stored in a 500-gallon aboveground storage tank. Mr. Creigh stated the oil filters were put into the facility dumpster. The solvents are managed in a Safety-Kleen unit and taken off-site by Safety-Kleen.

Mr. Creigh stated GSM has used a steam cleaner on-site. The effluent had previously been allowed to flow to the ground. Creigh stated the steam cleaner is not planned to be used until an effluent containment system can be designed. Fujitsubo asked Creigh to contact Keith Riley of the Department and the Kern County Environmental Health Department prior to construction of a containment system.

VI. Hazardous Waste Activity Description

After the facility processes the bulk ferrous items, an auto shredder fluff waste is produced. This waste stream is known to be high in lead and PCBs.

The auto shredder fluff has been stockpiled by the former and current owners. GSM has applied for a treatment variance through the Department. The treatment process is designed to render the auto shredder fluff non-hazardous and the treated waste can be disposed of at a Class III sanitary landfill.

The entire waste pile is proposed to be treated. At one time the waste pile was watered down regularly. This process may have caused the contaminants to migrate in the ground under the waste pile. Creigh stated Mittelhauser has evidence to the contrary.

The vehicle maintenance operation produces waste oil, used filters, and solvents.

The waste oil is stored in a 500-gallon aboveground tank. The tank is placed over a plastic liner with an absorbent berm surrounding the area.

Mr. Miyake was asked what happened to the spent oil filters. Mr. Miyake discussed the issue with his employee and stated they are usually discarded into the dumpster.

The solvents are collected in a unit and the unit is serviced by Safety-Kleen.

There was a steam cleaner used to clean equipment and parts. Mr. Creigh stated the steam cleaner is no longer used.

VII. Violations

1. Section 25201, Health and Safety Code.

Section 25201 of the Health and Safety Code requires a permit issued by the Department to store hazardous wastes on-site in excess of 90 days. GSM has a waste pile of auto shredder fluff waste on-site. Previous laboratory analysis indicates the auto shredder fluff waste exceeds the hazardous waste criteria. The waste pile has been in existence in excess of 90 days. GSM does not have a permit issued by the Department to store hazardous waste over 90 days.

2. Section 25189(c), Health and Safety Code.

Section 25189(c), Health and Safety Code prohibits the disposal of hazardous waste at unauthorized points. Mr. Miyake stated the spent oil filters from vehicles are disposed of into the site dumpster which is disposed of in a Class III sanitary landfill.

3. Section 66471, Title 22, California Code of Regulations (Cal. Code Regs.).

Section 66471, Title 22, Cal. Code Regs. requires a generator to determine if a waste is classified as hazardous waste. Two 55-gallon containers had what was thought to be a steam cleaner effluent from off-site. This waste stream had not been classified. A grease like waste was noted in a trash container. According to Creigh this waste had not been classified.

VIII. Observations

Upon arrival at the facility, Davis and Fujitsubo of the Department met with Miyake and Creigh of GSM. A survey of the site was done first.

Miyake spoke of an underground tank cleanup that had taken place on-site and reviewed by Kern County Environmental Health Department.

The shredder pile was observed. Previous inspections noted lack of a berm around the pile and part of the pile being on the adjacent property. A berm around the entire waste pile was observed. The waste on the adjacent property had been cleaned up according to Creigh.

There was a pile of what appeared to be metal wastes outside the bermed area. Mr. Creigh described the material as skimmings from steel manufacturing. Creigh stated he did not think the material would be regulated because it was primarily iron.

The vehicle maintenance area was observed. A grease like material was in the trash container. Fujitsubo asked where this waste was going. Miyake stated it was to be placed in the dumpster. Fujitsubo stated that the grease could be regulated and a waste classification would be required. Creigh stated the grease would be handled as hazardous until it could be tested for hazardous constituents.

The shop area was observed. Davis asked what happened to the floor sweepings. Creigh stated they probably went into the dumpster. Davis pointed out the sweepings could be hazardous. Creigh stated they would put the sweepings into the outgoing metal reclamation bin for recycling.

There is an aluminum recycling collection center on-site. Aluminum containers are collected and compressed into large bricks which are shipped off-site for recycling.

Within the aluminum recycling area, lead acid batteries were noted. Miyake stated they accept undamaged lead acid batteries and send them to recyclers. About 10% of the vehicles still have the batteries when brought to GSM. This is where the batteries come from.

The previous area of hydraulic fluid contamination could not be found. Distinct areas of contamination were not visible.

There was an enclosed area owned by PG&E. The electrical devices may have PCBs. GSM was unaware if PCBs are in the devices.

IX. Sampling Summary

No samples were taken.

X. Discussion with Management

The previous violations were discussed with GSM:

1. No EPA number - GSM currently has an EPA number.
2. Illegal storage, treatment, and disposal of auto shredder waste on-site - GSM stated they have applied for a variance and are working closely with Keith Riley of the Department. The shredder wastes continues to be stored in violation of Hazardous Waste Control Laws. When the variance for treatment is issued, GSM plans to treat the entire shredder waste pile and any waste generated in the future.
3. Disposal of used oil - GSM currently stores waste oil in an aboveground 500-gallon tank. The area under the tank is lined with plastic and the perimeter bermed with absorbent material. The previous area of hydraulic fluid spillage could not be identified.

Inspection Report
Golden State Metals, Incorporated
Page 6

4. Training - Training has been provided by Jerry Kapitza, an GSM employee. All MSDS' have been covered and all training is recorded in the personnel files.
5. Contingency Plan - GSM currently has a contingency plan written by Mittelhauser, Environmental consultants.
6. Labeling at the waste tank - The tank was adequately labeled at the time of inspection.
7. Equipment - Fire extinguishers are identified on-site on the contingency plan. Shovels and absorbent materials are available on-site.
8. Berm - A berm has been built around the shredder waste pile.
9. Local authorities contact - Creigh stated the Kern County Fire Department is considered the first responder. Creigh stated a Business Plan and Contingency Plan were sent to fire, health, and police departments. The Industrial Clinic has been designated by GSM for any hazardous waste injuries. Kaiser Health insurance cover the employee cost at the Industrial Clinic.
10. Aisle space - Adequate aisle space has been provided around the shredder waste pile.

The current violations were discussed with GSM:

1. Storage and disposal of auto shredder waste on-site - Creigh stated as soon as the variance for treatment is issued by the Department, the shredder waste pile will be alleviated.
2. Waste oil filters - Davis asked Creigh what was done with waste oil filters. Creigh stated the filters are disposed of into the facility dumpster. Davis stated GSM could have disposed of a hazardous waste. Creigh proposed to Fujitsubo to drain the filters for 24 hours and put the filters into the metal recovery process.
3. Classification of waste streams - Two 55-gallon containers were noted near the waste oil storage tank. Miyake asked Jerry Kapitza, GSM employee, what was in the containers. Kapitza stated the containers

had an effluent from a steam cleaning facility off-site. Fujitsubo stated if it is a waste, GSM will have to classify it as hazardous or non-hazardous and manage it accordingly. On 2/8/91 Miyake phoned Fujitsubo. Miyake stated he had made further inquiries into the two containers of liquid. Miyake said the containers had only tap water in them. The water was being used to fill vehicle radiators on-site. Fujitsubo stated when GSM is notified of the violation, a response in writing can be submitted. Miyake agreed to do so. Creigh stated the grease waste in the trash container would be isolated and classified as hazardous or non-hazardous and be managed accordingly.

XI. Attachments

- a. Checklist
- b. HARP
- c. Photographs
- d. Complaint Form

DEPARTMENT OF TOXIC SUBSTANCES CONTROL

REGION 1
1515 TOLLHOUSE ROAD
CLOVIS, CA 93611
(209) 297-3901



Inspection Report

Golden State Metals, Inc.
2000 E. Brundage Lane
P.O. Box 70158
Bakersfield, California 93387

EPA ID# CAD982489809

Inspected by: Larry Ramirez, Hazardous Substances Scientist
(HSS)

Date of Inspection: 11/20/97

Date of Report: 11/21/97

I. Purpose

Conduct a generator inspection and to check current status at this facility.

II. Representatives Present

Mr. Mike Gold, General Manager, GSM
Mr. Ron Hurleston, Ferrous Yard Manager, GSM
Larry Ramirez, HSS, DTSC

III. Owner/Operator

Adams Steel
3200 Frontera
Anaheim, California 92806
(714) 630-8901

IV. Background

GSM was bought by the Adams Steel Company in November 1996. The previous owner, the Hiuka American Corporation, filed for bankruptcy protection, Chapter 11, the same year.

Currently, GSM is operating as a metal recycler. The main interest the Department has is GSM had a variance to treat and store auto shredder waste (ASW). This variance was to have expired in 1997.

V. Inspection and Enforcement History

GSM has received enforcement documentation from the Department in the past. Violations included but were not limited to illegal disposal, storage and treatment of a hazardous waste. GSM stored and disposed tons of ASW at their site. The variance given to them was for treating the ASW by reclaiming the metal, treating the fluff and land filling it at a designated dump approved by the Regional Water Quality Control Board. (Please see file for more information.)

VI. Hazardous Waste Status

GSM is currently a generator of hazardous waste and is not a permitted TSD facility.

VII. Hazardous Waste Activity

** K20"
concrete
treatment*
ASW is generated by the shredding of automobiles. According to the staff at GSM, they only shred three times a week. The ASW is no longer treated at this facility as the treatment machinery is no longer operational. The ASW is transported to the Adams facility in Anaheim for treatment there.

WASTE OIL

Waste oil is generated through the maintenance of the motor vehicles at the site. According to Mr. Gold, all the vehicles that come onto the site are free of any liquids, batteries, and catalytic converters. The facility, in cooperation with the State of California Air Board, had a recent event known as a "clear air day". Owners of older cars, known air polluters, were allowed to drive their cars to the site and trade them in for currency. Since these cars were driven, free liquids such as gasoline waste oil, and anti-freeze were generated. These wastes were stored and will be handled by the clean air staff accordingly. The gasoline is used as a product for on-site machinery.

FREON GAS

Freon gas from refrigeration units is drained by a pump, stored in a five-gallon tank and taken to the Anaheim facility for reuse or disposal.

SOLVENT WASTE

A solvent bath, leased from the Safety-Kleen Company, is used in the auto maintenance yard to manage the solvent waste.

VIII. Observations

ASW Concrete Storage Pad

The first area inspected was the ASW storage pad. Here the ASW is stored before shipment to the Anaheim facility for treatment. Along the pad was the old treatment machinery which is currently not operational. At the time of inspection, ASW was being stored on the pad.

Shredder

The shredder was not in operation, although metal parts were piled at the front of it. At the time of inspection, a 747 jet airplane had been dismantled and was being prepared for shredding. Other metal parts such as refrigerators, washing machines and metal pipes were also being prepared for final shredding.

Storage Area

The waste oil tank is at this location and at the time of the inspection all seemed fine. A waste oil/water separator was in operation at the time. Mr. Hurleston stated the water is let run into the sump at all times. As the sump fills with oily water it is pumped back up into the tank separator where the oil is filtered out into another container and the clean water continues back into the sump. The oil reclaimed goes into the waste oil storage tank for further recycling. The oil filters from the separator are changed on a routine basis and placed into the oil filter container for recycling.

Freon Storage Area

This area is where the five-gallon tanks and pump are located. The tanks were labeled as Freon gas and were ready for transportation to the Anaheim facility. At the time of inspection there were four tanks.

IX. Violations

Failure to characterize waste

1. Section 66262.11, Title 22, California Code of Regulations (CCR), in that on or about November 20, 1997, Golden State Metals failed to determine if the Auto Shredder Waste (ASW) was hazardous. Upon inspection GSM was storing and transporting ASW as a non-hazardous waste.

critical?

Failed to prepare manifest

2. Section 66262.20, Title 22,, California Code of Regulations(CCR), in that on or about November 20, 1997, Golden State Metals failed to prepare a manifest for hazardous waste transported or sent off site. Upon inspection it was noted the ASW is transported by bill of lading to the Adams Steel site in Anaheim, California.

parent facility

Failed to dispose of hazardous waste at a authorized point

3. Section 25189.5(a), Chapter 6.5, Division 20, California Health and Safety Code(H&SC), in that on or about November 20, 1997, Golden State Metals transported the ASW to the Adams Steel site, a non-permitted, unauthorized site.

X. Sampling Summary

No samples were taken during the inspection.

XI. Discussion with Management

I discussed with Mr. Gold the issue of the ASW going to Anaheim as a hazardous waste. I stated that I would be consulting with DTSC staff at our headquarters to seek more information concerning ASW as a hazardous waste or not. Mr. Gold agreed and stated he would like to keep informed on this issue. I also explained to him of the potential violations that may exist. I concluded the inspection by reviewing the emergency response plan, hazardous communication plan, hazardous waste storage area inspection log and worker health and safety records. At the end of the inspection, we agreed to keep in touch.

XII. Attachments

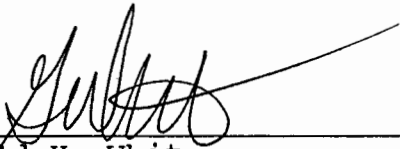
- a. Emergency Response Plan
- b. Hazard Communication Program
- c. Inspection Log
- d. Training Certificate
- e. Safety-Kleen receipt
- f. Purchase Agreement
- g. Freon Recovery log sheet



Larry Ramirez
Hazardous Substances Scientist

1/20/98

Date Submitted



Gerald H. White
Unit Chief
Statewide Compliance Division

1/28/98

Approval Date



10



Cal/EPA

Department of
Toxic Substances
Control

January 28, 1998

Pete Wilson
Governor
Peter M. Rooney
~~James M. Strook~~
Secretary for
Environmental
Protection

1515 Tollhouse Road
Clovis, CA 93611

Mr. George Adams, President
Golden State Metals, Inc.
2000 East Brundage Lane
P.O. Box 70158
Bakersfield, California 93307

Dear Mr. Adams:

This letter is in response to your letter dated December 5, 1997 regarding residual material generated at Golden State Metals (GSM), through the process of shredding automobile carcasses and white goods. Your letter stated the shredder residue is collected and transported to the Adams Steel facility in Anaheim, California, for subsequent separation of the commingled steel and non-ferrous components.

Pursuant to Section 25124 of the California Health and Safety Code, this residue produced at Golden State Metals is considered a "waste", even though you may deem it as having value and, therefore, is a product. Further, Section 66261.120, Title 22, California Code of Regulations (CCR) allows auto shredder waste to be classified as a special waste if specific criteria are met. If those criteria are not met, the waste is a hazardous waste.

A generator of hazardous waste is required by Section 66262.11, Title 22, CCR, to determine if the waste is hazardous by testing it or by applying general knowledge. I have enclosed a copy of the applicable sections of the regulations and statutes for your review.

Please provide to this office within 10 days of the date of this letter any information you have that will assist our Department in determining compliance with Section 66262.11. Failure to do so may result in the Department seeking enforcement action.

The issuance of this letter does not preclude the Department from taking administrative, civil, or criminal action as a result of the violations noted.

Mr. George Adams
January 28, 1998
Page 2

If you have any questions regarding this issue or letter, please feel free to call me at (209) 297-3901.

Sincerely,

A handwritten signature in dark ink, appearing to read "Gerald H. White", with a long horizontal flourish extending to the right.

Gerald H. White
Unit Chief
Statewide Compliance Division

Enclosure



Cal/EPA

Department of
Toxic Substances
Control

1515 Tollhouse Road
Clovis, CA 93611

February 20, 1998

Mr. Mike Gold
Golden State Metals
P.O. Box 70158
Bakersfield, California 93387

Dear Mr. Gold:

On November 20, 1997, the California Environmental Protection Agency, Department of Toxic Substances Control (DTSC), conducted an inspection of Golden State Metals, 2000 East Brundage Lane, P.O. Box 70158, Bakersfield, California 93387. The enclosed report describes the findings of this inspection, including all violations and any actions that should be taken by the facility to correct the violations.

You are required by section 25185(c)(3) of the Health and Safety Code to submit a written response to the DTSC within 15 days describing the corrective actions that you have taken or propose to take to bring your facility into compliance. If you dispute any of the violations, you should explain your disagreement in this written response. The issuance of this letter does not preclude DTSC from taking administrative, civil, or criminal action as a result of the violations noted in the report.

All pertinent information derived from the inspection, including documents, photographs, and sampling results, are included as attachments to the report, except copies of documents provided by your facility at the time of the inspection. In order to reduce copying and mailing costs, these have not been returned to you with the report; copies will be provided if you request them. This report will become a public document; you may request that any trade secret or facility security information be withheld from public disclosure. (See Health and Safety Code Section 25173 enclosed.)



Pete Wilson
Governor
Peter M. Rooney
~~James M. Strack~~
Secretary for
Environmental
Protection

LR:cm
LR27.018

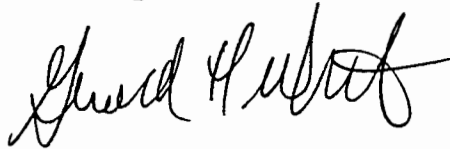


Printed on Recycled Paper

Mr. Mike Gold
February 20, 1998
Page 2

If you have any questions regarding this letter, or if you wish to meet with DTSC to discuss any questions or concerns you have with the inspection, the report, the violations, or the proposed corrective action, please call Mr. Larry Ramirez at (209) 297-3943.

Sincerely,

A handwritten signature in cursive script, appearing to read "Gerald H. White".

Gerald H. White
Unit Chief
Statewide Compliance Division

Enclosure

12

CONTACT REPORT

AGENCY/AFFILIATION: California Department of Toxic Substances Control		
DEPARTMENT: Hazardous Waste Management Department		
ADDRESS/CITY: P.O. Box 806, Sacramento		
COUNTY/STATE/ZIP: Sacramento County, CA 95816-0806		
CONTACT(S)	TITLE	PHONE
Peter Woods	Statewide Compliance Officer	(916) 322-4660
WESTON EMPLOYEE: Nancy Dagle		DATE: 2/05/01
SUBJECT: Records of incident		
SITE NAME: Golden State Metals		CERCLIS ID NO.: CAD982489809

In 1993 and 1994, Golden State Metals disposed of their auto shredder waste (ASW) at a Class I landfill. 10,000 tons of waste are currently on site.

CONTACT REPORT

AGENCY/AFFILIATION: Kern County Environmental Health Services Department		
DEPARTMENT: Environmental Health		
ADDRESS/CITY: 2700 M Street, Suite 300, Bakersfield		
COUNTY/STATE/ZIP: Kern County, CA 93263		
CONTACT(S)	TITLE	PHONE
Wesley Nicks	Environmental Health Specialist	(661) 862-8749
WESTON EMPLOYEE: Greg Berner		DATE: 8/09/01
SUBJECT: Site Description		
SITE NAME: Golden State Metals		CERCLIS ID NO.: CAD982489809

Kern County Environmental Health Department is currently is carrying out an Administrative Order against Golden State Metals due to shipping violations, among other things.

ENVIRONMENTAL HEALTH SERVICES DEPARTMENT

STEVE McCALLEY, R.E.H.S., Director
2700 "M" STREET, SUITE 300
BAKERSFIELD, CA 93301-2370
Voice: (661) 862-8700
Fax: (661) 862-8701
TTY Relay: (800) 735-2929
e-mail: eh@co.kern.ca.us



RESOURCE MANAGEMENT AGENCY

DAVID PRICE III, RMA DIRECTOR
Community Development Program Department
Engineering & Survey Services Department
Environmental Health Services Department
Planning Department
Roads Department



June 11, 2001

Mr. George Adams, President
Golden State Metals & Adams Steel
3200 East Frontera Street
Anaheim, California 92806

**DEPARTMENT OF TOXIC
SUBSTANCES CONTROL
"OFFICIAL FILE COPY"**

**RE: INSPECTION REPORT AND REPORT OF VIOLATIONS FOR
GOLDEN STATE METALS,
2000 EAST BRUNDAGE LANE, BAKERSFIELD, CA**

Dear Mr. Adams:

On March 21, March 29, and April 10, 2001, a representative of the Kern County Environmental Health Services Department conducted inspections at 2000 East Brundage Lane in Bakersfield, California, at the Golden State Metals recycling facility. The following inspection report details the observations noted during those inspections. Violations of the California Health and Safety Code (HSC) and the California Code of Regulations (CCR), [Title 22], that were observed during those inspections and the corrective actions necessary to gain compliance are detailed below.

INSPECTION REPORT

<u>Dates:</u>	March 21, 2001, March 29, 2001, and April 10, 2001	
<u>Facility Name:</u>	Golden State Metals	
<u>Facility Address:</u>	2000 East Brundage Lane, Bakersfield	<u>EPA ID#</u> : CAD068547996
<u>Specialist/Inspector:</u>	Wesley Nicks	<u>Facility I.D.#</u> FA569/571

INSPECTION NARRATION

On March 21, 2001, I conducted an inspection at 2000 East Brundage Lane to determine compliance with the Hazardous Waste Control Law (HWCL) [HSC Chapter 6.5], and Title 22, CCR, Chapter 11, that were referred to this Department from the Department of Toxic Substances Control. I arrived at the facility at 1400 and met with the facility manager, Mike Gold, and the Yard Foreman, Michael Xydias. I explained that I was responding to a referral from the DTSC and would also conduct an inspection of the hazardous materials business plan, hazardous waste handling practices, and parts of the above ground storage tank program. Gold agreed to the inspection. I initially requested from Gold copies of the hazardous materials business plan, any manifests or bill of lading for hazardous waste generated at Golden State Metals, and training documentation for employees.

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INSPECTION NARRATION CONTINUED:

I also asked Gold for any transportation documentation and, based on prior knowledge concerning the facility, analytical information for the auto shredder waste and waste water received from their facility in Anaheim known as Adams Steel. Gold responded that all of the requested information was maintained at the Anaheim facility, Adams Steel.

I asked Gold if I could inspect the operation and if he could explain how the process works. Gold agreed to provide a tour of the facility and explained the operating process. Gold directed my attention to several junked cars and explained that the owners of the cars get rebates from the Air Pollution Control District to junk them. The owners drive the cars to Golden State Metals and they drain the oils and fuel, remove the batteries, then shred the car. The iron parts are then removed with a magnet and the rest is accumulated on the ground and eventually transported to Adams Steel in Anaheim to remove the nonferrous metals.

AGW is Hazardous waste or not

During the tour, I observed the violations noted on the DTSC referral including: waste oil and auto shredder waste that is allowed to impact the soil, no hazardous waste manifests are completed for auto shredder waste transported to the Anaheim facility, failure to label hazardous waste containers, including the drum storing PCB capacitors. Other violations observed but not noted on the DTSC referral were: lack of labels on seven drums containing hazardous waste near the waste oil tank that contain gasoline/water, antifreeze, and waste oils. The same containers of hazardous waste were not closed/sealed and no manifests are retained at the facility for the hazardous waste. In response to several drums observed near two train car storage units Gold said that they were all empty because they needed them from time to time to contain waste oil.

When we returned to the office I asked Gold if I could see the hazardous materials business plan because some of the chemicals I observed in the yard were not on our Department's inventory list. Gold said that the plan is in Anaheim and that he could have Robin Robinson, their environmental person, bring the paper work requested including the business plan the next week. I left Gold my card and asked him to contact me when Robinson could arrange a meeting. Gold contacted me by phone on March 27, 2001, and scheduled a meeting for March 29, 2001, at 0900.

On March 29, 2001, I met with Robinson and Gold to complete the inspection. Robinson provided copies of a hazardous waste manifest for 491 Kg of PCB capacitors transported to Kettleman City on December 8, 1999, two receipts from Coles Services for waste oil dated November 2, 2000, and December 11, 2000, for a total of 475 gallons, three receipts from Safety Kleen for waste solvent related to their parts washer, and a receipt and manifest for refrigerant captured from appliances. I asked Robinson if any other manifests exist for hazardous waste generated at Golden State Metals within the past three years. Robinson said that there are other manifests but they are maintained at the Anaheim facility. I requested that Robinson explain how the gasoline and antifreeze drained from cars is managed. He said that it is used in vehicles around the facility. I asked Robinson about the gasoline and water in the drum I observed last week. Robinson said he did not know about that and was not sure where it would go. I asked Robinson if he had any analytical documentation for the auto shredder waste hauled to Anaheim and he said, "no, we never analyzed it because it is not waste." I asked Robinson for analytical documents for the waste liquids in the treatment unit on the west side of the facility previously noted during the first inspection.

INSPECTION NARRATION CONTINUED:

He said that he does not keep those records another employee named George Camano, at the Anaheim office, had those. Robinson then accompanied me on a facility tour and agreed to allow photographs. I requested Robinson explain how the system worked. He explained that the vehicles are run through the shredder and then the larger iron parts are removed with a magnet. The remaining material is deposited on the ground and later transported to Adams Steel in Anaheim for processing to remove the nonferrous metals.

During our tour, I observed five drums and four large cardboard boxes near the north west corner of the facility containing an unknown solid. The only identification on the drums and boxes was hand written that said "rejected Ni Co." I asked Robinson what was in the drums and he replied he did not know, George Camano placed them there. I also observed an oily liquid in roll off bins plumbed to the large tanks on the west side of the facility reportedly designed for waste water treatment. Robinson said that the liquid material in the tanks is nonhazardous waste water from the Anaheim facility. I asked for analytical to determine the hazardous characteristics. Robinson again said the analytical was in Anaheim. I observed two roll-off bins half full of soil that appeared to be contaminated with petroleum. When asked for analytical Robinson stated that George had that information.

On the way back to the office, I observed the drums Gold said were empty during my March 21, 2001, visit. I walked over to them and noticed that they were full of waste oil filters. I asked how long have those drums been here and Robinson said that he did not know. I counted 26 drums, eight were open. I asked Robinson where the filters would go and he said, "technically we could put them in the auto shredder but I guess Coles Services will take them." I again asked Robinson how long the drums had been there and he said they were probably left by the previous owner. We returned to the office and I issued the inspection form.

I contacted Robin Robinson by phone on April 9, 2001, and asked for consent to collect samples at the Golden State Metals Facility. Robinson agreed and on April 10, 2001, Brian Pitts and I met with Michael Xydas and obtained samples from four areas. Samples were retrieved from the oily liquid in the two metal bins adjacent to the waste water treatment unit, two samples from the unknown grey powder in the drums in the north west corner labeled only as rejected "Ni Co", and one sample from the auto shredder waste pile just below the conveyer belt. Brian Pitts donned appropriate personnel protective equipment and collected the samples in lab certified sample jars. I assisted Pitts and labeled the samples. I provided Xydas splits of the samples and photographed the locations they were taken. I also photographed the same violations noted during the previous inspection including hazardous waste containers not properly labeled and the waste oil, gasoline, and antifreeze, that is allowed to impact the ground.

REPORT OF VIOLATIONS

1. The Respondent violated 22 CCR Section 66262.34 (f)(2)(3)(A)(B)(C). Failure to properly label hazardous waste containers.

- (f) *Generators who accumulate hazardous waste on site without a permit or grant of interim status shall comply with the following requirements:*
 - (2) *the date the applicable accumulation period specified in subsection (a) or (d) of this section begins, for purposes of subsection (a) and (b) of this section, shall be clearly marked and visible for inspection on each container and tank; and*
 - (3) *each container and tank used for onsite accumulation of hazardous waste shall be labeled or marked clearly with the words, "Hazardous Waste. " Additionally, all containers and portable tanks shall be labeled with the following information:*
 - (A) *composition and physical state of the waste;*
 - (B) *statement or statements which call attention to the particular hazardous properties of the waste (e.g. flammable, reactive, etc.);*
 - (C) *name and address of the person producing the waste.*

The 55-gallon steel drum containing waste PCB capacitors that were removed from appliances was not properly labeled on January 23, 2001, as observed by DTSC representative Larry Ramirez. During my subsequent inspection on March 21, 2001 and on March 29, 2001 I observed and photographed the same violation. On April 10, 2001 during sample collection activities I observed and photographed the drum of PCB capacitors that remained improperly labeled.

Five 55 gallon steel drums and four cardboard containers of hazardous metal grinding waste were not properly labeled on March 21, 2001 or on March 29, 2001 as observed and photographed during the inspections. The same violation was noted on April 10, 2001 when samples were collected from those containers.

One 55-gallon steel drum containing waste antifreeze, one 55-gallon drum containing waste gasoline and water, and five 55 gallon steel drums containing waste crankcase oil and transmission fluid were observed to have no labels on March 21, 2001 during the initial inspection. The same violation existed on March 29, 2001 during the second inspection and on April 10, 2001 as photographed.

REPORT OF VIOLATIONS CONTINUED:

2. The Respondent violated HSC section 25504 (a) (b)(1)(2)(3) (c) Incomplete hazardous materials inventory, emergency response plans and procedures, evacuation plans and training records.

Business plans shall include all of the following:

- (g) The inventory of information required by section 25509 and whatever additional information that the administering agency finds is necessary to protect the health and safety of persons, property, or the environment....*
- (b) Emergency response plans and procedures in the event of a reportable release or threatened release of a hazardous material, including , but not limited to, all of the following:*
 - (1) Immediate notification to the administering agency and to the appropriate local emergency rescue personnel.*
 - (2) Procedures for the mitigation of a release or threatened release to minimize any potential harm or damage to persons, property, or the environment.*
 - (3) Evacuation plans and procedures, including immediate notice, for the business site.*
- (c) Training for all new employees and annual training, including refresher courses, for all employees in safety procedures in the event of a release or threatened release of a hazardous material, including, but not limited to, familiarity with the plans and procedures specified in subdivision (b) . These training programs may take into consideration the position of each employee.*

During the inspection on March 21, 2001, and March 29, 2001, the inventory of hazardous materials was noted as incomplete. Insufficient training records were provided and the mitigation and evacuation plans were not available for inspection.

3. The Respondent violated 22 CCR section 66265.31. Failure to operate a facility to minimize the possibility of the release of hazardous waste to the soil.

Facilities shall be maintained and operated to minimize the possibility of a fire, explosion, or any unplanned sudden or non-sudden release of hazardous waste or hazardous waste constituents to air, soil, or surface water which could threaten human health or the environment.

Waste oil and auto shredder waste is allowed to impact the soil routinely as noted and photographed during inspections on January 23, 2001, March 21, 2001, March 29, 2001, and April 10, 2001.

REPORT OF VIOLATIONS CONTINUED:

4. The Respondent violated HSC section 25143.10 (a)(2)(3)(B). Failure to provide information regarding recyclable hazardous waste.

(a)any person who recycles more than 100 Kilograms per month of recyclable material under a claim that the material qualifies for the exclusion or exemption pursuant to section 25143.2 shall, on or before July 1, 1992, and every two years thereafter, provide to the local officer or agency authorized to enforce this section pursuant to subdivision (a) of section 25180, all of the following information, using the format established in subdivision (d), in writing:

- (2) The name and address of the generator of the recyclable material.*
- (3) Documentation that the requirements of any exemptions or exclusions pursuant to Section 25143.2 are met, including, but not limited to, all of the following:*

(B) Where the basis for the exclusion is that the recyclable material is used or reused to make a product or as a safe and effective substitute for a commercial product, a general description of the material and products, identification of the constituents or group of constituents, and their approximate concentrations, that would render the material or product hazardous under the regulations adopted pursuant to Sections 25140 and 24141, if it were a waste, and the means by which the material is beneficially used.

During the inspections on March 21, 2001, March 29, 2001, and April 10, 2001, waste water was observed and photographed in the treatment unit on the North West side of the facility. To date no records have been submitted to this Department documenting compliance with the above requirements.

5. The Respondent violated 22 CCR section 66262.11. Failure to characterize waste.

A person who generates a waste, as defined in section 66261.2, shall determine if that waste is a hazardous waste....

The Auto shredder waste shipped from Golden State Metals to Adams Steel in Anaheim has not been characterized. During the inspection on March 29, 2001 Robin Robinson stated that the auto shredder waste transported to the Anaheim facility has not been characterized because it is not considered to be a waste. In a letter dated May 27, 1999 from Norman E. Riley, Chief of the Resource Recovery Section for the California Department of Toxic Substances Control, to George Adams, President of Adams Steel and Golden State Metals, the facility was informed that the auto shredder waste produced at this facility is considered hazardous waste. Analytical documentation was requested that would characterize the auto shredder waste, the waste water in the tanks on the north west side of the facility and the old fines piles. To date, this Department has not received the required information.

*Need
hazardous
waste
manifests*

REPORT OF VIOLATIONS CONTINUED:

6. The Respondent violated 22 CCR section 66262.40 (c) Failure to maintain test records.

A generator shall keep records of any test results, waste analysis or other determinations in accordance with 66262.11 for at least three years from the date the waste was last sent to on-site or off-site treatment, storage, or disposal.

During the inspections on March 21, 2001, and March 29, 2001, representatives of Golden State Metals and Adams Steel indicated that analytical information exists and is available for the waste liquids stored in the treatment unit near the north west corner of the facility, also for the old "fines" piles on site and the waste soil in the bins just north of the treatment unit. A letter requesting the analytical information was received by Robin Robinson on April 19, 2001. Except for analytical information on the waste soil in the roll off bins, this Department has not received the requested test results.

7. The Respondent violated HSC Section 25189.5(a)(c)(d). Illegal disposal, storage, transportation and treatment of hazardous waste.

(a) The disposal of any hazardous waste, or the causing thereof, is prohibited when the disposal is at a facility which does not have a permit from the department issued pursuant to this chapter, or at any point which is not authorized according to this chapter.

(c) Any person who knowingly transports or causes the transportation of hazardous waste, or who reasonably should have known that he or she was causing the transportation of any hazardous waste, to a facility which does not have a permit from the department issued pursuant to this chapter, shall, upon conviction, be punished by imprisonment in a county jail for not more than one year or by imprisonment in the state prison.

(d) Any person who knowingly treats or stores any hazardous waste at a facility which does not have a permit from the department issued pursuant to this chapter, or at any point which is not authorized according to this chapter, shall, upon conviction, be punished by imprisonment in a county jail for not more than one year or by imprisonment in the state prison.

During inspections on January 23, 2001, March 21, 2001, March 29, 2001, and April 10, 2001, waste oil and auto shredder waste was observed on the ground. In a letter dated January 4, 1999, from Norman E. Riley, Chief of the Resource Recovery Section of the California Department of Toxic Substances Control to Mr. George Adams, President of Adams Steel and Golden State Metals the facility was informed that auto shredder waste is a hazardous waste and that Adams Steel in Anaheim could not accept the material from any of its affiliates. Based on the lack of manifests provided to this Department and admissions during interviews with employees of Golden State Metals and Adams Steel, the auto shredder waste is transported without the appropriate manifests to Adams Steel in Anaheim, a facility without a permit to accept the waste from the Department of Toxic Substances Control.

grab samples ~~and samples~~ of metals
ASW contain ~~high~~ ~~medium~~ ~~low~~ levels of metals
subm. land corner low levels

1990
Waste oil (A)
found at
Depth of
20 feet
63ppm
In area of
high PCB's
100ft was
non detect.
Another area of
high PCB's
20' → 5.97 ppm
Another area
of concern (D)
130' → non
detect of
PCB's

PCB's
low levels

REPORT OF VIOLATIONS CONTINUED:

8. The Respondent violated 22 CCR section 66260.40 (a). Failure to maintain manifests for three years.

(a) A generator shall keep a copy of each manifest in accordance with section 66262.23(a) for three years or until the generator receives a signed copy from the designated facility which received the waste. This signed copy shall be retained as a record for at least three years from the date the waste was accepted by the initial transporter.

In a letter from this Department dated April 16, 2001, manifests for the last three years were requested within 10 days for any and all hazardous waste generated from this facility. This Department has not received the requested information.

9. The Respondent violated 22 CCR 66262.23 (a)(1)(2)(3)(4). Transporting hazardous waste without a manifest.

(a) The generator of any hazardous or extremely hazardous waste to be transported off-site shall:

- (1) Complete the generator and waste section and sign the manifest certification according to the instructions in the appendix to this chapter; and*
- (2) obtain the handwritten signature of the initial transporter and date of acceptance on the manifest; and*
- (3) retain two copies, in accordance with section 66262.40(a); and*
- (4) Within 30 days of each shipment of hazardous waste submit to the Department a legible copy of each manifest used.*

Auto shredder wastes have been transported routinely from Golden State Metals to Adams Steel without hazardous waste manifests since at least 1998 and continue to the present. In a letter dated May 27, 1999, from Norman E. Riley, Chief of the Resource Recovery Section of the Department of Toxic Substances Control, to George Adams, President of Adams Steel and Golden State Metals the facility was informed that the auto shredder waste produced at Golden State Metals is considered hazardous waste and must be managed pursuant to HSC 25143.2 (a), which requires the use of a manifest. During the inspection on March 29, 2001, Robin Robinson indicated that no manifests have been used for the transportation of auto shredder waste from Golden State Metals in Bakersfield to Adams Steel in Anaheim. In a letter dated April 16, 2001, this Department requested the required manifests. To date this Department has not received the required documentation.

10. The Respondent violated 22 CCR section 66262.34 (a). Accumulation of hazardous waste on site for greater than 90 days without a permit or interim status from the Department of Toxic Substances Control.

(a)a generator may accumulate hazardous waste on-site for 90 days or less without a permit or grant of interim status....

REPORT OF VIOLATIONS CONTINUED:

As indicated by the lack of available hazardous waste manifests, waste PCB capacitors are stored for greater than 90 days without a permit or interim status. Additionally, there were no labels with accumulation start dates posted on PCB containers to determine accumulation periods.

11. The Respondent violated 22 CCR section 66265.173 (a). Failure to keep containers of hazardous waste closed/sealed.

A container holding hazardous waste shall always be closed during transfer and storage, except when it is necessary to add or remove waste.

During inspections on March 21, 2001, March 29, 2001, and April 10, 2001, one drum containing waste oil, one drum containing gasoline and water, one drum containing waste antifreeze, one drum containing waste PCB capacitors, one roll off bin full of waste water, and one drum containing waste transmission fluid were observed to be open to the air or could not be adequately sealed. These violations were noted on March 21, 2001, and photographed on March 29, 2001, and April 10, 2001. A sample was obtained and photographed from the roll off bin on April 10, 2001.

12. The Respondent violated 22 CCR section 66265.195 (a)(2)(5)(c). Failure to document inspections of hazardous waste tank systems

(a) The owner or operator shall inspect, where present, at least once each operating day:

(2) the above ground portions of the tank system, if any, to detect corrosion or releases of waste;

(5) for uncovered tanks, the level of waste in the tank, to ensure compliance with section 66265.194(b)(3).

(c) The owner or operator shall document in the operating record of the facility an inspection of those items in subsections (a) and (b) of this section.

During inspections conducted on March 21, 2001, and March 29, 2001, no records were made available, as requested, to indicate that the above ground waste oil tank, collection sump, and roll off bin full of waste water, are inspected daily to ensure the waste is not released to the environment.

13. The Respondent violated 22 CCR section 66266.130 (3)(4)(5). Improper storage of used oil filters.

(3) The drained used oil filters are accumulated, stored, and transferred in a closed, rainproof container that is capable of containing any used oil that may separate from the filters placed inside...

(4) Storage of less than one ton of used oil filters shall be limited to one year. Storage of one ton or more of used oil filters is limited to 180 days.

REPORT OF VIOLATIONS CONTINUED:

(5) Persons generating, transporting, or receiving used oil filters shall use a bill of lading to record the transfer of used oil filters. Bills of lading must indicate generator, transporter, and receiving company names, addresses, telephone numbers, the quantity and size of used oil filter containers transferred, and the date of transfer. A copy of each bill of lading must be kept on the premises of the generator, transporter, and receiving facility where the used oil filters were handled. Copies of bills of lading shall be kept for a period of three years.

During the inspections on March 21, 2001, March 29, 2001, and April 10, 2001, 26 drums of used oil filters were observed and photographed. Of these, six were open to the air. The accumulation of filters is greater than one ton and have been stored for more than 180 days. To date no bill of lading with the required information has been submitted as requested.

14. The Respondent violated 22 CCR section 66266.81 (4)(A)(B). Failure to use or maintain a manifest or bill of lading to record the shipments of lead acid storage batteries.

(A) The generator shall use either the manifest or a bill of lading which fulfills the requirements of Title 13 CCR section 1161, to record the shipment of spent lead-acid storage batteries to a person who stores the batteries or who uses, reuses, recycles or reclaims the batteries or their components.

(B) The generator shall retain, at the generators place of business for at least three years, a legible copy of each manifest or bill of lading which identifies spent lead-acid storage batteries shipped to a person who stores the batteries or who uses, reuses, recycles or reclaims the batteries or their components.

During inspections on March 21, 2001, and March 29, 2001, and again in a letter dated April 16, 2001, bill of lading documents for the waste lead acid batteries were requested. This Department has not received any information regarding the waste lead acid batteries to date.

CORRECTIVE ACTIONS

1. Label all containers of hazardous waste as specified in 22 CCR section 66262.34 within 14 days of receipt of this report.
2. Discontinue discharge of waste oil, antifreeze, gasoline and any other hazardous waste liquids to the soil immediately. Provide a corrective action work plan detailing the characterization and proposed remedial action for previous releases and time frames for completion of remedial actions within 30 days of receipt of this report.
3. Complete a hazardous materials business plan as specified in HSC section 25504 within 30 days of receipt of this report.

4. Provide a work plan detailing operational practices that would prevent future discharge of auto shredder waste to the soil within 60 days of receipt of this report.

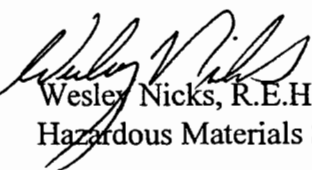
CORRECTIVE ACTIONS CONTINUED:

5. Provide the information specified in HSC 25143.10 regarding the recycling of hazardous waste water at this facility within 30 days of receipt of this report.
6. Characterize all waste streams produced at this facility within 30 days of receipt of this report.
7. Maintain all analytical records regarding the characteristics of hazardous waste produced by this facility for three years from the date the analysis is completed. The records must be maintained at the facility generating the waste.
8. Discontinue transporting auto shredder waste produced at this facility to Adams Steel in Anaheim, California, immediately.
9. Maintain all hazardous waste manifests at the facility that generated the waste for a minimum of three years from the date the signed copy is returned from the facility that received the waste.
10. Begin using a hazardous waste manifest for all hazardous waste transported from this facility including auto shredder waste as specified in 22 CCR section 66262.23 immediately.
11. Begin transporting all hazardous waste to an approved facility under appropriate manifests within 90 days.
12. Close and seal all hazardous waste containers immediately. Maintain all hazardous waste containers so that they are closed and sealed at all times except when adding or removing waste.
13. Begin documenting daily inspections of all hazardous waste tank systems immediately.
14. Close and seal all containers of used waste oil filters within seven days. Recycle or, transport with a bill of lading for recycling, all waste oil filters at this facility within 14 days

If you have any questions, you can contact me at (661) 862-8749 or Joe Canas at (661) 862-8756. Thank you for your cooperation in this matter.

Sincerely,

Steve McCalley, Director

BY: 
Wesley Nicks, R.E.H.S.
Hazardous Materials Specialist

WN:jg

cc: Robin Robinson, Adams Steel
George Camano, Adams Steel
Larry Ramirez, DTSC

ENVIRONMENTAL HEALTH SERVICES DEPARTMENT

STEVE McCALLEY, R.E.H.S., Director
2700 "M" STREET, SUITE 300
BAKERSFIELD, CA 93301-2370
Voice: (661) 862-8700
Fax: (661) 862-8701
TTY Relay: (800) 735-2929
e-mail: eh@co.kern.ca.us



RESOURCE MANAGEMENT AGENCY

DAVID PRICE III, RMA DIRECTOR
Community Development Program Department
Engineering & Survey Services Department
Environmental Health Services Department
Planning Department
Roads Department

June 15, 2001

**DEPARTMENT OF TOXIC
SUBSTANCES CONTROL
"OFFICIAL FILE COPY"**

George Adams
3200 East Frontera Street
Anaheim, CA 92806

RE: Notification of Potential Filing of Administrative Enforcement Order

Dear Mr. Adams:

On March 21, March 29, and April 10, 2001, a Kern County Environmental Health Services (EHSD) representative conducted inspections at 2000 East Brundage Lane in Bakersfield, CA, EPA Id # CAD068547996, Golden State Metals, Inc. Based on information from the inspection, the EHSD is preparing to bring an administrative action against the owner of Golden State Metals to ensure compliance and assess penalties, pursuant to Section 25187 of the California Health and Safety Code (H&SC). A copy of the amended inspection report is enclosed.

The administrative action being considered includes violations of Health and Safety Code, Section 25143.10(a)(2)(3)(B), and California Code of Regulations (CCR), 22 CCR Sec. 66262.34 (f)(2)(3)-(A)(B)(C), 22 CCR Sec. 66265.31, 22 CCR Sec. 66262.11, 22 CCR Sec. 66262.40(c), 22 CCR Sec. 25189.5(a)(c)(d), 22 CCR Sec. 66260.40(a), 22 CCR Sec. 66262.23(a)(1)(2)(3)(4), 22 CCR Sec. 66262.34(a), 22 CCR Sec. 66265.173(a), 22 CCR Sec. 66265.195(a)(2)(5)(c), 22 CCR Sec. 66266.130(3)(4)(5), and 22 CCR Sec. 66266.81(4)(A)(B). These regulations require the owner of Golden State Metals, as a generator of state-regulated hazardous waste, to comply with generator standards found in the Hazardous Waste Control Law (HWCL) and in Title 22, California Code of Regulations, Chapter 11.

Before filing an Administrative Enforcement Order and Notice of Defense (hereinafter "Order") against the owner of Golden State Metal, Inc., EHSD is extending the opportunity to provide any other information that should be considered before filing an Order against the owner of Golden State Metals, Inc. You may also take this opportunity to commence settlement discussions concerning the alleged violations at your business. If you wish to submit such information, please direct it to:

Joe Canas, HMS IV
Kern County Environmental Health Services Department
2700 "M" Street, Ste. 300
Bakersfield, CA 93301

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6/15/01

June 15, 2001

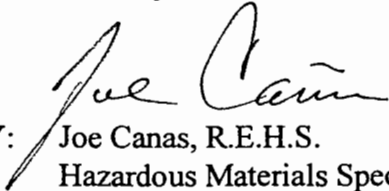
Page Two

It is our intention to file an Order against the owner of Golden State Metals, Inc. within the next 14 days, unless you first advise us of substantial reasons not to proceed as planned. Any penalty proposed for violations of HWCL and its implementing regulations will be calculated pursuant to Title 22 of CCR. A copy of the current Title 22 penalty regulations are enclosed.

Thank you for your prompt attention to this matter. If you have any questions, please feel free to contact either myself (661) 862-8756 or Wesley Nicks of our staff at (661) 862-8749. You may also have your counsel contact Mark Nations, County Counsel at (661) 868-3818.

Sincerely,

Steve McCalley, Director


BY: Joe Canas, R.E.H.S.
Hazardous Materials Specialist IV

JC:jg

cc: Chuck McLaughlin, DTSC State Regulatory Programs Division Liaison

16

CONTACT REPORT

AGENCY/AFFILIATION: San Joaquin Valley Unified Air Pollution Control District		
DEPARTMENT: Compliance		
ADDRESS/CITY: 2700 M Street, Suite 275, Bakersfield		
COUNTY/STATE/ZIP: Kern County, CA 93301		
CONTACT(S)	TITLE	PHONE
Rosemary	Receptionist	(661) 326-6900
WESTON EMPLOYEE: Paula Abajian		DATE: 5/14/01
SUBJECT: Emissions Testing		
SITE NAME: Golden State Metals		CERCLIS ID NO.: CAD982489809

The San Joaquin Valley Unified Air Pollution Control District sent all available files.

CONTACT REPORT

AGENCY/AFFILIATION: California Department of Toxic Substances Control		
DEPARTMENT: Clovis Field Office		
ADDRESS/CITY: 1515 Toll House Road, Clovis		
COUNTY/STATE/ZIP: Fresno County, CA 93611		
CONTACT(S)	TITLE	PHONE
Barbara Doebling	File Clerk	(559) 297-3905
WESTON EMPLOYEE: Nancy Dagle		DATE: 2/01/01
SUBJECT: Records of Incident		
SITE NAME: Golden State Metals		CERCLIS ID NO.: CAD982489809

All available files were sent.

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CONTACT REPORT

AGENCY/AFFILIATION: Central Valley Regional Water Quality Control Board (RWQCB)		
DEPARTMENT: Fresno Office, Site Clean Up/Toxics		
ADDRESS/CITY: 3614 East Ashlan Avenue, Fresno		
COUNTY/STATE/ZIP:		
CONTACT(S)	TITLE	PHONE
Anthony Medrano	Associate Scientist	(559) 445-5116
WESTON EMPLOYEE: Nancy Dagle		DATE: 1/22/01
SUBJECT: Records of Incident		
SITE NAME: Golden State Metals		CERCLIS ID NO.: CAD982489809

The Fresno Office of the RWQCB has no files on the site.

GOLDEN STATE METALS, 200 EAST BRUNDAGE LANE CAD98039809

Latitude: 35 21 18 Longitude: 118 58 55, BAKERSFIELD, CA 93387

19



WA-Controlled/Critical Infrastructure-Water Assessments

SITE REPORT FOR STATE OF CALIFORNIA

May 18, 2001

Site Name: GOLDEN STATE METALS, 2000 EAST BRUNDAGE LANE 'CAD983489809'

BAKERSFIELD, CA 93387

Latitude: 35 21 18 Longitude: 118 58 55

Sources:

Population Density: PL94-171, US Bureau of the Census (1990 Census)

Endangered Species: Natural Diversity Database, California Dept. of Fish & Game 1998

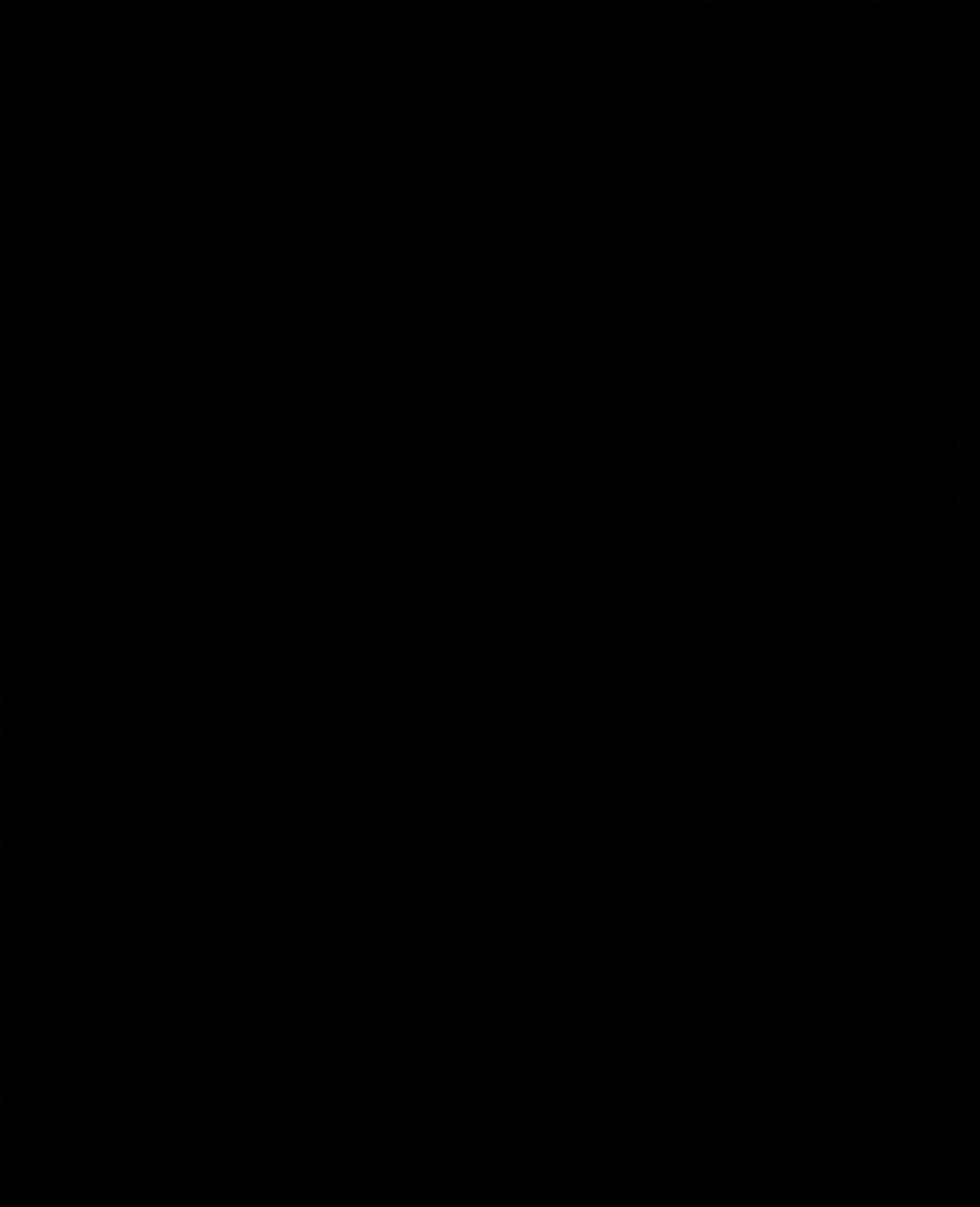
Drinking Water Supply Wells: Water Quality Monitoring Database, California Dept. of Health Services, 1998

SITE POPULATION SUMMARY:

RADIUS DISTANCE FROM SOURCE CUMULATIVE POPULATION

WA-Controlled/Critical Infrastructure-Water Assessments

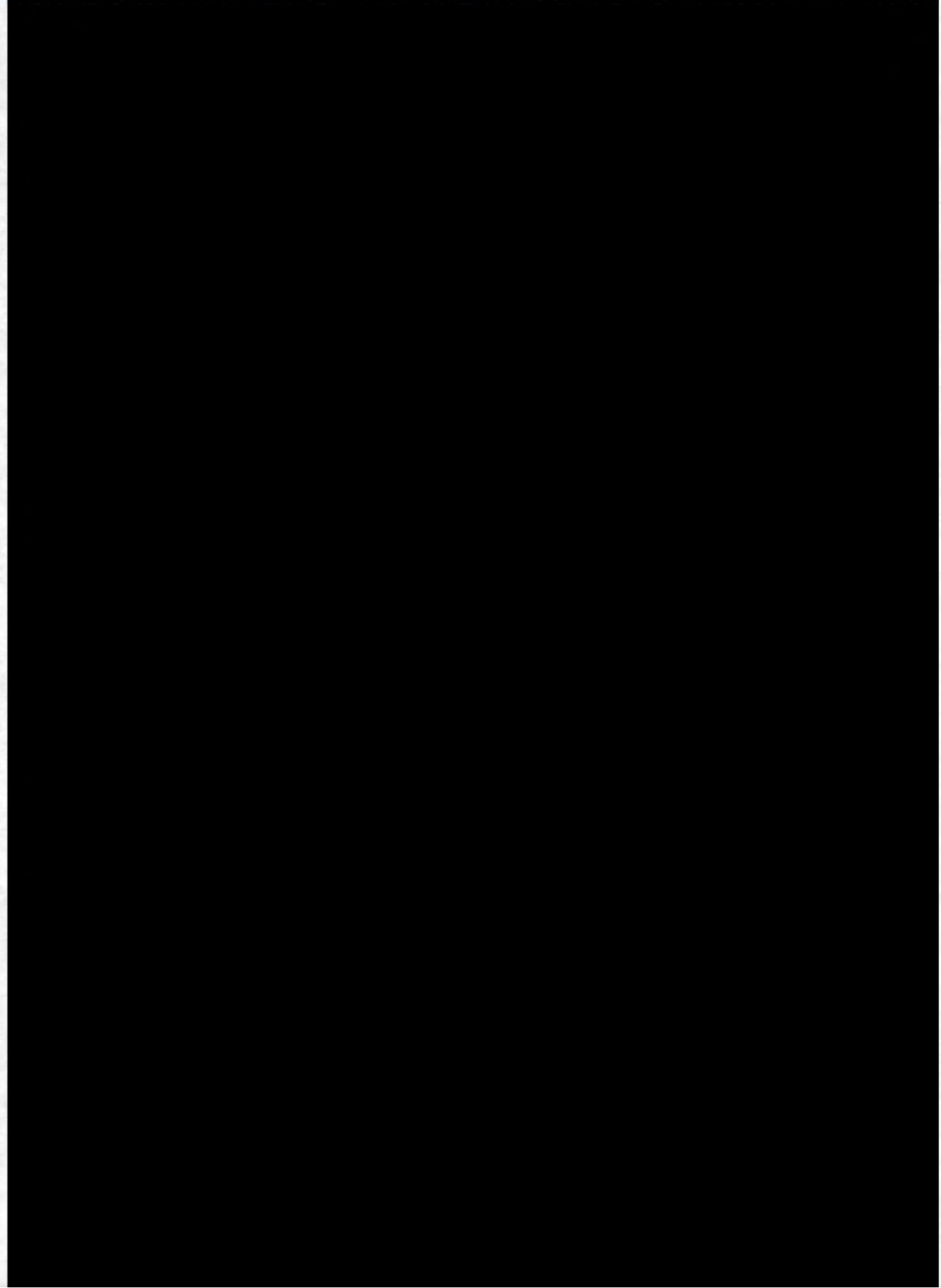
WA-Controlled/Critical Infrastructure-Water Assessments



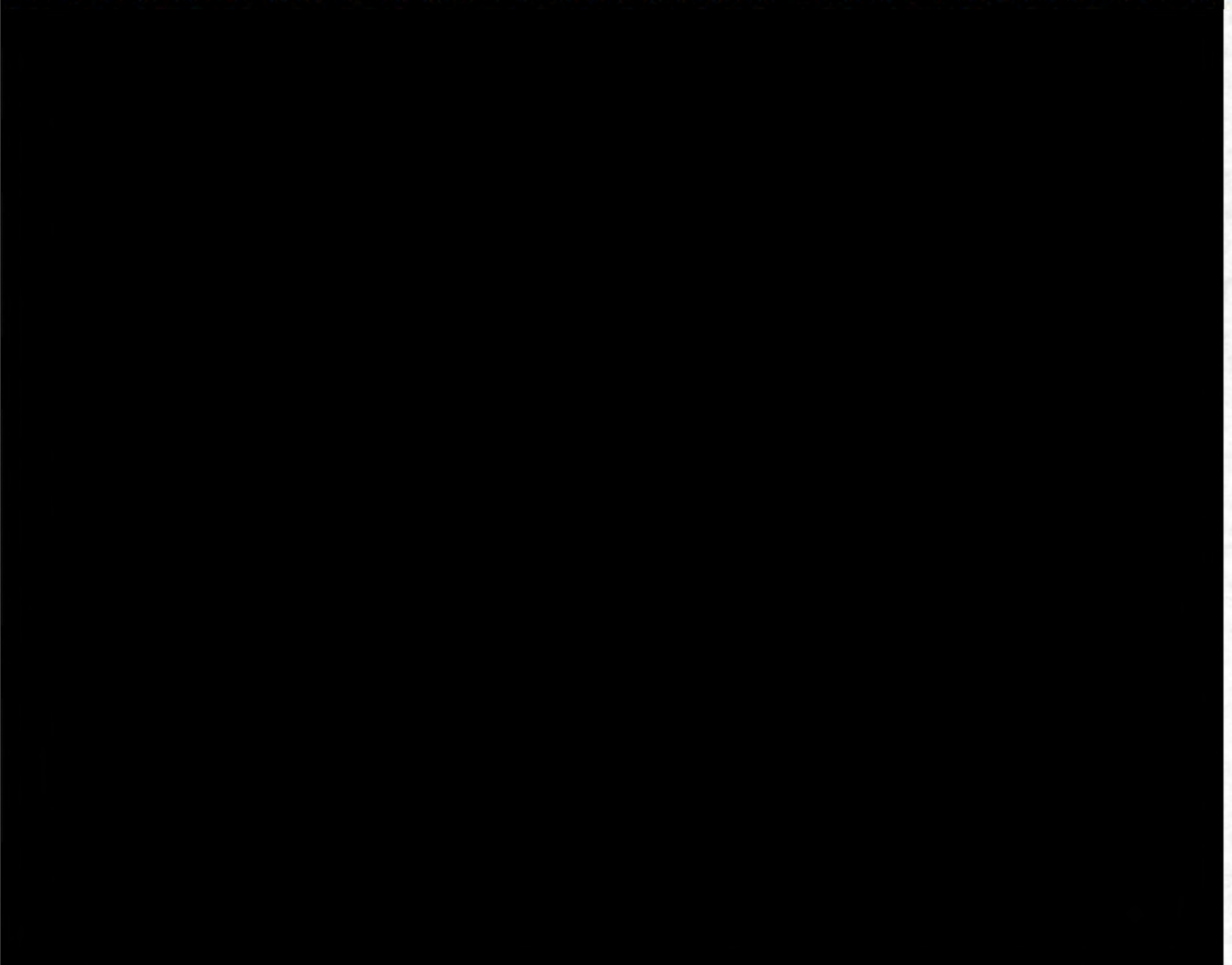
WA-Controlled/Critical Infrastructure-Water Assessments

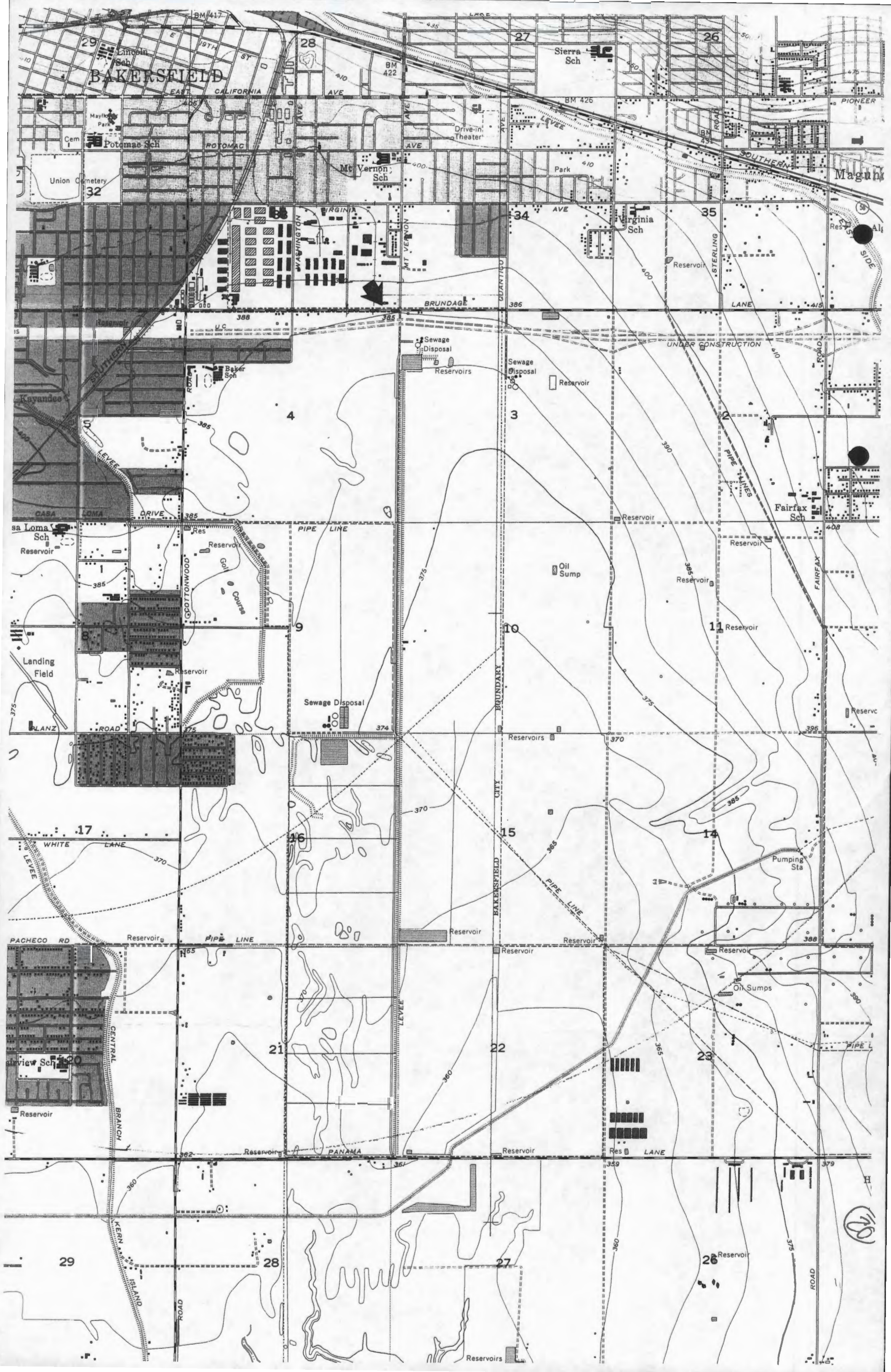


WA-Controlled/Critical Infrastructure-Water Assessments



WA-Controlled/Critical Infrastructure-Water Assessments





CONTACT REPORT

AGENCY/AFFILIATION: San Joaquin Valley Unified Air Pollution Control District		
DEPARTMENT: Compliance		
ADDRESS/CITY: 2700 M Street, Suite 275, Bakersfield		
COUNTY/STATE/ZIP: Kern County, CA 93301		
CONTACT(S)	TITLE	PHONE
Crayton Smith	Compliance Specialist	(661) 326-6900
WESTON EMPLOYEE: Greg Berner		DATE: 8/15/01
SUBJECT: Emissions Testing		
SITE NAME: Golden State Metals		CERCLIS ID NO.: CAD982489809

Compliance monitoring of stack emissions was conducted at the site between 1992 and 1996. According to APCD records, no violations are on file.

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SITE RECONNAISSANCE INTERVIEW AND OBSERVATIONS REPORT

DATE: August 20, 2001

SITE NAME: Golden State Metals

OBSERVATIONS MADE BY: Greg Berner

FACILITY REPRESENTATIVE(S) and TITLE(S): N/A

EPA ID: CAD98248989809

A drive-by of Golden State Metals was conducted on August 20, 2001. The following information was obtained and photographs were taken at the time of the drive-by:

The site is located in east Bakersfield along Brundage Lane. The office for the site is located along Brundage Lane. The property is unpaved, and in an industrial area surrounded by large commercial/industrial properties. The site is located in a topographically flat area. The nearest residence is approximately 0.25 mile from the site. At the time of the drive-by, large tractors were loading auto shredder waste into train cars and semi-truck trailers. On site, there were several piles of old auto shredder waste, new auto shredder waste, several large excavators, various tractors, semi-trucks, and scrap iron. WESTON observed no more than 10 workers on site. Two auto shredder mechanisms with attached smoke stacks were on site, neither of which were in use. A cloud of particulate matter was seen drifting from the load bucket of an on-site tractor.

Photographs



Photograph #1. View of southwest corner of property along East Brundage Lane.



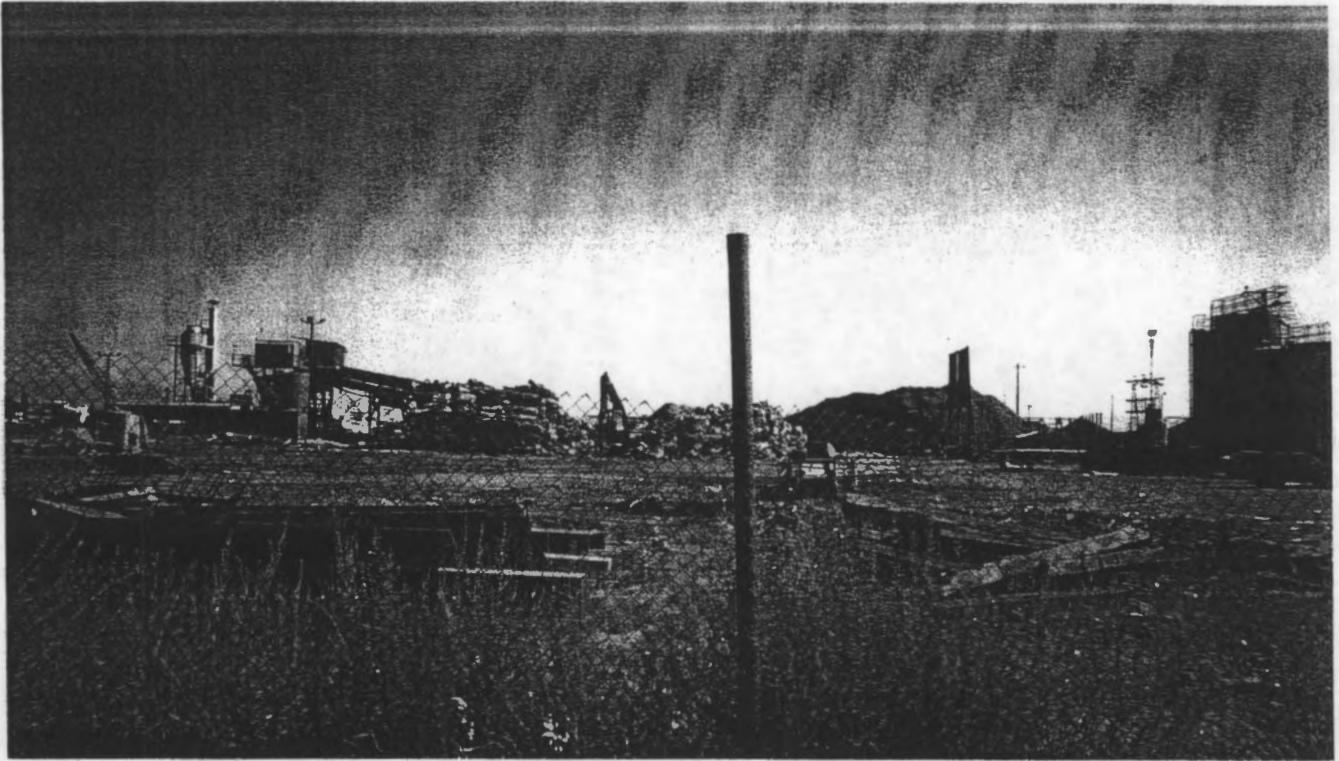
Photograph #2. View of facility from north end. Notice pile of ASW on left.



Photograph #3. View from northeast corner of property. Notice loading of ASW into train cars in background.



Photograph #4. View of scattered debris at north end of property.



Photograph #5. From left to right: View of auto shredder conveyor and autos to be shredded. ASW in background.